

IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE

FOR THE MIDDLE DISTRICT

NASHVILLE DIVISION

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JANE DOE, )  
 )  
 Plaintiff, )  
 )  
 v. ) No. 3:20-CV-01023  
 ) Jury Demand  
 THE METROPOLITAN ) Judge Trauger  
 GOVERNMENT OF NASHVILLE AND ) Magistrate Judge  
 DAVIDSON COUNTY, TENNESSEE ) Holmes  
 AND DR. ADRIENNE BATTLE ) Lead Case  
 )  
 Defendants. )  
 -----

DR. LILY MORENO LEFFLER, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 THE METROPOLITAN )  
 GOVERNMENT OF NASHVILLE AND )  
 DAVIDSON COUNTY, TENNESSEE, )  
 AND DR. ADRIENNE BATTLE )  
 )  
 Defendants. )  
 -----

DR. JAMES BAILEY, )  
 DR. PIPPA MERIWETHER, and )  
 DR. DAMON CATHEY, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 )  
 METROPOLITAN GOVERNMENT )  
 OF NASHVILLE AND DAVIDSON )  
 COUNTY, TENNESSEE and )  
 DR. ADRIENNE BATTLE, )  
 )  
 Defendants. )  
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The Deposition of: MICHELLE MAULTSBY-SPRINGER  
 May 24, 2022

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1           The deposition of Michelle  
2 Maultsby-Springer was taken by counsel for the  
3 Plaintiffs, by notice, in Nashville, Tennessee, on  
4 May 24, 2022, via remote means, pursuant to the  
5 provisions of the Federal Rules of Civil Procedure.

6           All formalities as to notice, caption,  
7 certificate, reading and signing of the deposition  
8 are not waived. All objections, except as to the  
9 form of the questions, are reserved to the hearing.

10 -----  
11  
12 APPEARANCES:

13 For the Plaintiffs:

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15       Dr. Lily Leffler  
16       Dr. Pippa Meriwether  
17       Jane Doe

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1                    MICHELLE MAULTSBY-SPRINGER,  
2       called as a witness and, having been first duly  
3       sworn, was deposed as follows:

4       EXAMINATION BY MS. STEINER:

5            Q.     Okay. Ms. Springer, Could you state your  
6       full name for the record?

7            A.     Yes. I am Barbara Michelle  
8       Maultsby-Springer.

9            Q.     Ms. Springer, have you ever given a  
10      deposition before?

11          A.     No, I have not.

12          Q.     Have you ever testified before?

13          A.     No, I have not.

14          Q.     Have you been a party to a lawsuit before?

15          A.     Yes, I have.

16          Q.     What type of a case and what -- were you  
17      the plaintiff or defendant?

18          A.     Perhaps I'm not -- I was named as being  
19      part of a Metro Nashville Public Schools lawsuit.

20          Q.     And who was the plaintiff?

21          A.     Plaintiff was Mr. Howard Jones. You know,  
22      in the role that I'm in, I might be named at any  
23      given time, but that's the one that I can recall.

24          Q.     Okay. And did you stay a party defendant  
25      in that case, or were you let out; do you know?

1           A.     Can you describe what you mean by "let  
2 out?"

3           Q.     Did the judge -- was there any sort of a  
4 motion filed to dismiss you from the lawsuit that  
5 may have been granted or denied?

6           A.     Not to my knowledge.

7           Q.     Do you know what happened to that lawsuit?

8           A.     I do not have any updates regarding that  
9 lawsuit.

10                   MR. FOX: Let me object. I think it calls  
11 for a legal analysis. I think the witness might be  
12 not understanding what it means to be a party to a  
13 lawsuit versus just a witness. Part of the lawsuit.  
14 BY MS. STEINER:

15           Q.     Ms. Springer --

16           A.     Well, then, no, ma'am. The answer is no.  
17 My apology for the confusion.

18           Q.     Okay. Because that surprised me. I  
19 wasn't sure that you had been a party to anything,  
20 but when Mr. Jones -- or is Dr. Jones?

21           A.     Mr. Jones, I believe.

22           Q.     Okay. He was an assistant principal; is  
23 that correct?

24           A.     Yes.

25           Q.     At which school?

1 A. At John F. Kennedy Middle School.

2 Q. What was -- when he was the assistant  
3 principal, what was your job title?

4 A. My role was the executive director.

5 Q. And did you have any input in the decision  
6 to terminate or to -- what happened to Mr. Jones,  
7 was he terminated or was he demoted?

8 A. Neither, to my knowledge.

9 Q. Was there any plan to demote him or to  
10 terminate him?

11 A. Not to my knowledge, no.

12 Q. Then why did he sue the district?

13 A. I am uncertain about the details of why he  
14 sued the district.

15 Q. Did you know -- who was the principal of  
16 J.F. Kennedy?

17 A. At the time was Sam Braden.

18 Q. And did Howard Jones have any complaint  
19 about Sam Braden?

20 A. I don't want to speak for Mr. Jones, so I  
21 can't speak on behalf of Mr. Jones.

22 Q. Dr. Springer, I want you to speak on  
23 behalf of yourself. Do you know of any complaints  
24 that Mr. Jones brought against Mr. Braden?

25 A. Now, complaints that he brought against

1 Mr. Braden?

2 Q. Yes.

3 A. Yes. In that, I believe that at the end  
4 of year, there was a decision made by Mr. Braden  
5 to -- for Mr. Jones to not return back to that  
6 school, from my recollection. And --

7 Q. Did he nonrenew -- go on.

8 A. Go ahead. I interrupted you.

9 Q. You can do that. Was there something else  
10 you wanted to add?

11 A. No, not at this time.

12 Q. And so then you were the executive  
13 director over Sam Braden, who was the principal over  
14 Howard Jones, correct?

15 A. Correct.

16 Q. Okay. And when you said Sam Braden did  
17 not want Howard Jones to return to J.F. Kennedy  
18 school, did he nonrenew Howard Jones?

19 A. Not to my knowledge. It's not nonrenewed.

20 Q. He was not nonrenewed, correct?

21 A. Not to my knowledge. Not to my knowledge.  
22 I -- nonrenewing generally means that you are no  
23 longer an assistant principal and to my knowledge,  
24 he still remains an assistant principal at Metro  
25 Nashville Public Schools. He just did not return



1 back to J.F. Kennedy Middle School.

2 Q. Do you know whether or not he was removed  
3 from his assistant principal position and told he  
4 was doing to be transferred to a lower level  
5 position at another school?

6 A. No, not no my knowledge. In fact, to my  
7 knowledge, he is currently an assistant principal at  
8 a high school, and so that's a lateral move.

9 Q. Do you know whether or not HR had to look  
10 into multiple schools to find a position in a school  
11 that would accept Howard Jones as an assistant  
12 principal?

13 A. No, ma'am. I am not aware of that  
14 process.

15 Q. Okay. Now, tell me everything that you  
16 are aware of with regard to the Howard Jones  
17 lawsuit.

18 A. I'll repeat what I said earlier. There  
19 was concern for Mr. Jones regarding him not  
20 returning back to John F. Kennedy to be the  
21 assistant principal. That's what I know about that  
22 situation. I also know that -- that Mr. Jones  
23 clearly was not -- did not desire that outcome, from  
24 my knowledge, and based upon the fact that he then  
25 later, you know, went on to seek litigation.

1 Q. Okay. Now, if a complaint of sexual  
2 harassment is filed against a principal, should that  
3 be brought to the attention of the executive  
4 director over that principal?

5 A. Yes.

6 Q. Okay. And should the results of any  
7 investigation concerning sexual harassment be  
8 brought to the attention of the executive director?

9 A. Yes.

10 Q. Okay. Were you made aware of any sexual  
11 harassment investigations concerning Sam Braden?

12 A. Yes.

13 Q. Okay. How many people complained about  
14 Sam Braden sexually harassing them?

15 A. To my knowledge, two.

16 Q. Who were they?

17 A. You're asking me to say their names and I  
18 can't recall. One being the -- one being the -- I  
19 believe he served as the campus supervisor, and I  
20 cannot recall his name off the top of my head. And  
21 then there was another teacher, who I believe was a  
22 science teacher.

23 Q. Do you recall what they said that Sam  
24 Braden had done?

25 A. One individual, the campus supervisor,

1 made claims that Mr. Braden made advances towards  
2 him in a sexual nature, and the other, science  
3 teacher, was about the way that he put his arm  
4 around her at a faculty meeting, is what I remember.

5 Q. Okay. And that's it?

6 A. Yes.

7 Q. Okay. And so for the first individual,  
8 what was his specific complaint about Sam Braden?

9 A. That he made sexual advances towards him.

10 Q. What type of sexual advances?

11 A. Verbal sexual advances.

12 Q. Do you recall what was said or how it  
13 occurred?

14 A. I believe one incident, you know, was  
15 perhaps a gentleman was in the principal's office  
16 and he made sexual advances towards him. And then  
17 the other, like I said, happened during a faculty  
18 meeting.

19 Q. Okay. We're going to show you a copy of  
20 the complaint, and I want to ask you whether or not  
21 the -- you recall the allegations in this complaint.  
22 And Ms. Harbison is going to share the screen with  
23 you, okay?

24 A. Thank you.

25 Q. Okay. Ms. Springer, is that -- can I call

1 you Dr. Springer; is that okay?

2 A. Certainly. Thank you.

3 Q. Or should it be Maultsby-Springer?

4 A. Springer is fine.

5 Q. Dr. Springer, do you recognize this  
6 document that we're showing you on the screen?

7 A. I believe that I have viewed it.

8 Q. Is this the complaint that Howard Jones  
9 filed against Metro Schools?

10 A. Appears that is what this document is.

11 Q. Let's go through this. We're going to  
12 scroll down and go through the allegations just  
13 briefly. Could you -- do you see this where it says  
14 Howard Jones is vice principal at Stratford and  
15 former vice principal at JFK Middle School; see  
16 that?

17 A. Yes.

18 Q. Is that true?

19 A. Correct.

20 Q. And then let's go down. Paragraph two  
21 says, Defendant Metro Schools is a governmental  
22 entity subdivision, State of Tennessee, okay. Is  
23 that true; do you know?

24 A. True.

25 Q. Go down to paragraph three, please. Okay.

1 Let's go to allegations of fact. Okay. Paragraph  
2 five where it says, Howard Jones has been an  
3 employee of Metro Government and Metro Schools for  
4 some 20 years. He's been a pastor for three decades  
5 and is devoted to instilling integrity in his pupils  
6 by conducting himself in the highest of moral,  
7 ethical standards; do you see that?

8 A. I do.

9 Q. Is that true?

10 A. This appears to be what Mr. Jones is  
11 stating. Which piece are you asking me is accurate?

12 Q. Paragraph five, do you see anything in  
13 paragraph five that is not accurate?

14 A. I am not certain about the number of years  
15 he has served. I am aware that he has been an  
16 employee of Metro Schools, and I am aware that he  
17 has served as a pastor.

18 Q. Okay. Do you see in paragraph six it  
19 says, at the time of the conduct complained of  
20 herein, he was a vice principal at JFK Middle and  
21 executive principal was Dr. Sam Braden; is that  
22 correct?

23 A. Correct.

24 Q. And then you see paragraph seven says,  
25 Braden had for at least four years engaged in overt

1 sexual harassment of both men and women teachers.  
2 This behavior included lewd and suggestive comments  
3 and explicit demands for sex.

4 Now, when you were executive director, was  
5 that brought to your attention that there was an  
6 allegation of that?

7 A. Yes.

8 Q. Do you see in the summer of 2017, Braden  
9 encounters Mr. Sherman Swindall, who was delivering  
10 a TV to Braden's home for Aaron Rents, and with no  
11 application or background check of any kind, Braden  
12 offered Swindle the position of head football coach  
13 and Swindall accepted the job; is that true?

14 A. I'm not certain regarding the hiring  
15 details and how that transpired. I do know that  
16 Mr. Sherman Swindall, which was his name I could not  
17 recall at the time, was employed with Metro Schools  
18 at John F. Kennedy Middle.

19 Q. And did Mr. Swindall make complaints of  
20 sexual harassment against Mr. Sam Braden? Dr.  
21 Springer, did you hear me? Dr. Springer, did you  
22 freeze up? Hello?

23 MR. FOX: I think her image is frozen.

24 MS. HARBISON: Looks frozen on my end,  
25 too.

1 (Off-the-record discussion held.)

2 BY MS. STEINER:

3 Q. Dr. Springer, can you see the complaint?

4 A. I can.

5 Q. Good. Let's go down past paragraph seven,  
6 Dr. Springer.

7 (Requested portion of record read.)

8 THE WITNESS: The answer is yes.

9 BY MS. STEINER:

10 Q. Do you see here where Braden -- where Mr.  
11 Jones states that Braden, after hiring Swindall  
12 immediately began to demand sexual favors from  
13 Swindall, including demands for oral sex and that  
14 Swindall rejected Braden's advances; do you see  
15 that?

16 A. I do.

17 Q. Did you know that that occurred when you  
18 were the executive director?

19 A. I was made aware of it, yes.

20 Q. Do you see where it says, paragraph nine,  
21 Mr. Jones reported this conduct to human resources  
22 where it was assigned to Scott Lindsey and that  
23 Lindsey placed Braden on administrative leave?  
24 Okay. And do you see where it says that Sharon  
25 Pertiller took the letter, tore it in pieces and

1 said we're not going to suspend Sam Braden; do you  
2 see that?

3 A. I do see that listed in this document.

4 Q. Do you know whether or not any  
5 investigation was done with regard to that?

6 A. There was an investigation that was done  
7 in regards to this allegation.

8 Q. Let me ask you a question. Let me stop  
9 you a second. Were you aware that -- were you  
10 involved in any meeting with Dr. Battle about the  
11 Sam Braden situation?

12 A. Not to my recollection. You're asking if  
13 I had been in a meeting with Dr. Braden, Dr. Battle  
14 and myself, is that what you're asking?

15 Q. No. Dr. Battle. Were you discussing this  
16 situation of sexual harassment about Sam Braden?

17 A. Her being my supervisor, I am imagining  
18 that I had to certainly, you know, make her aware of  
19 the allegation.

20 Q. And did you know that Sam Braden was Dr.  
21 Battle's teacher when she was in school?

22 A. I'm not aware.

23 Q. Did you know -- did you hear Dr. Battle  
24 make any statements that she was not going to  
25 discipline Sam Braden because he was her teacher



1 when she was in school?

2 A. No. I am not aware of that at all, and if  
3 that was said, that would be outside and out of  
4 alignment of common practice.

5 Q. That would be a violation of policy,  
6 correct?

7 A. Correct. When allegations are made, they  
8 have to be investigated.

9 Q. Do you see here where it says Braden  
10 retaliated? Paragraph ten. Let me ask you this, do  
11 you know whether or not the complaints against Sam  
12 Braden were investigated when first brought to HR?

13 A. To my knowledge, yes. When they were  
14 brought to my attention, they certainly were  
15 investigated.

16 Q. Was Braden left in his position?

17 A. Based upon what I can recall, Mr. Braden  
18 was -- ultimately resigned from his position.

19 Q. Was he left in his position when the --  
20 because you see paragraph ten, it says Braden  
21 retaliated, he threatened Swindall with termination  
22 and told him he would make it impossible for him to  
23 get hired with Metro again? Braden was still in his  
24 position for a bit after allegations were raised,  
25 correct?

1           A.     I am not an HR expert. What I will say  
2 is, I believe there is due process in that with an  
3 investigation, there's a determination by HR to  
4 either place an administrator on leave or not. And  
5 I'm thinking back to the case, I can recall that  
6 Mr. Braden was ultimately then placed on leave is  
7 what I do recall, and then ultimately resigned.

8           Q.     Okay. So my question to you is different.  
9 As the executive director of Sam Braden, was there  
10 any time after the complaint was brought to HR and  
11 to your attention that Braden was allowed to return  
12 to his job as principal?

13          A.     I believe that he may have returned for a  
14 few days. I can't recall the number of days at all,  
15 but then shortly after that, placed on leave and  
16 ultimately resigned.

17          Q.     Who made the decision to allow Braden to  
18 return to his job?

19          A.     Those decisions are made by human  
20 resources.

21          Q.     It's my understanding human resources  
22 recommends that and the administration either  
23 accepts or denies the recommendation, correct?

24          A.     I believe that HR writes letters for  
25 leave, termination, et cetera. That is the process

1 that I know and am aware of.

2 Q. Does the administration have to approve  
3 HR's recommendation?

4 A. Can you clarify what you mean by  
5 administration? Do you mean human resources?

6 Q. No, I mean when HR makes a  
7 recommendation -- and let me ask you this. Is it  
8 true that HR only makes recommendations, doesn't  
9 actually make the decision?

10 A. To be quite honest with you, during that  
11 time, what I can recall, that's an HR process and HR  
12 would make the ultimate decision in, you know,  
13 concert with whatever evidence that they have before  
14 them, as the expert.

15 Q. Did Dr. Battle have any input into any of  
16 these decisions concerning Braden?

17 A. Based upon common practice and practice,  
18 we will consult and move at the direction of HR in  
19 these decisions. Certainly, you know, there will be  
20 conversation about any evidence or information  
21 concerning the allegations, but, ultimately, to my  
22 knowledge, this is an HR process.

23 Q. Okay. Now, do you see where it says that  
24 Braden, paragraph ten, attempted to involve the  
25 school bookkeeper and front desk clerk in abusive

1 behavior asking them to state falsely Mr. Swindall  
2 was chronically late for work, and then he began to  
3 threaten these women with being written out of the  
4 budget. Did you know that was going on under you in  
5 a school that you were the executive director for?

6 A. I believe in the HR process, there were  
7 interviews that were conducted, and this is part of  
8 the information that was gathered from the  
9 investigation, so I was made aware through the  
10 investigative process.

11 Q. So you were aware then that Mr. Howard --  
12 what's his name? Could you go up just about three  
13 paragraphs, please? Howard Jones. Go back to where  
14 you were. Thank you.

15 Were you -- so you were aware that  
16 Howard -- that Howard Jones had made the allegation  
17 that Braden had threatened Swindall with  
18 termination, and that he would never be able to get  
19 hired with Metro again, and that he also threatened  
20 the bookkeeper and front desk clerk, that they  
21 needed to falsify records that Swindall was  
22 chronically late for work. You knew of those  
23 allegations, correct?

24 A. Yes, through the investigative process, I  
25 was made aware of those allegations.

1 Q. Okay. Now, if you go down to paragraph  
2 11, please. And did you know that Howard Jones had  
3 given a statement to HR that documented what we've  
4 gone through about the sexual harassment of  
5 Swindall, and that Braden threatened two employees  
6 to falsify -- one to falsify records and threatened  
7 them with their job if they did not do that? Did  
8 you know that Howard Jones gave a statement to HR  
9 about that?

10 A. My apologies, you kind of went in and out.  
11 Can you repeat that, please?

12 Q. Did you know that Howard Jones had given a  
13 statement to HR documenting everything that's in  
14 this complaint about the sexual harassment of  
15 Swindall and that Braden had wanted two employees to  
16 falsify records so he could retaliate against  
17 Swindall, and he threatened the employees that if  
18 they didn't falsify records, their jobs would be  
19 written out of the budget; did you know that?

20 MR. FOX: Objection to form.

21 THE WITNESS: I heard all the way up until  
22 that end.

23 BY MS. STEINER:

24 Q. Did you know that Howard Jones had given a  
25 statement to HR that documented the sexual

1 harassment of Swindall by Sam Braden?

2 A. Yes. Given that this is all included in  
3 the investigative process, yes, I would have been  
4 made aware.

5 Q. Did you know that Howard Jones had also  
6 told HR that Sam Braden had threatened two other  
7 employees, that they needed to falsify records so he  
8 could fire Swindall, and if they didn't falsify the  
9 records, they were going to lose their jobs; did you  
10 know that?

11 A. Yes, I found out through the investigative  
12 process.

13 Q. Okay. Did you know that in paragraph 12  
14 that Sam Braden's secretary complained to Howard  
15 Jones that Braden had ordered her to write a  
16 statement accusing Swindall of chronic tardiness and  
17 that that statement was false, but that she wrote  
18 the letter for Braden but said it was per his  
19 instructions, and then she told plaintiff that  
20 Braden was firing her; did you know that?

21 A. I recall this being part of the  
22 investigative information that was submitted, yes.

23 Q. Did you know that Howard Jones reported  
24 that to HR?

25 A. I believe he did report this to HR through

1 the investigative process.

2 Q. Okay. And then did you know that Howard  
3 Jones got a letter telling him he was terminated?

4 A. No, I am not aware of a letter that was  
5 submitted that indicated that Mr. Jones was  
6 terminated.

7 Q. Did you know that Mr. Jones had made an  
8 allegation in his complaint that he got a letter  
9 telling him he was terminated?

10 A. I do not recall a letter that would  
11 indicate that he was terminated, given that he was  
12 not being terminated and is now still an assistant  
13 principal with Metro Schools.

14 Q. Do you see in paragraph 13 where Howard  
15 Jones states that he complained to Sharon Pertiller  
16 and to you, and that he was told -- if we can move  
17 down just a bit on paragraph 13. He was told that  
18 Sam Braden could fire whoever he pleased; do you  
19 recall that occurring?

20 A. I do not.

21 Q. Okay. Well, then Howard Jones says he  
22 filed charges with the EEOC about his termination;  
23 do you recall that occurring?

24 A. I recall him submitting a formal  
25 complaint, but this is certainly -- I was not part

1 of the conversation with Mr. Jones or Ms. Pertiller  
2 together in which that comment was made, so I am --  
3 about him being fired and that the principal can  
4 fire who he would like to fire, I was not a part of  
5 that conversation at all. So I am aware that  
6 Mr. Jones did file a formal complaint.

7 Q. And so you were his executive director,  
8 correct?

9 A. Correct.

10 Q. And you had --

11 A. At John F. Kennedy, yes.

12 Q. -- and you had a job duty for knowing who  
13 was fired and who was not fired and for the reason  
14 they were fired for the employees under you,  
15 correct?

16 MR. FOX: Objection. I'm not sure that  
17 last answer was stated corrected. I think you both  
18 were talking on top of each other.

19 MS. STEINER: Could the court reporter  
20 read back the question to make sure we got it.

21 (Requested portion of record read.)

22 BY MS. STEINER:

23 Q. Dr. Springer, you were Howard Jones'  
24 executive director when he was at J.F. Kennedy,  
25 correct?



1           A.     I was the executive director of John F.  
2 Kennedy, yes.

3           Q.     And you had a job duty for knowing who  
4 were the employees in the schools that reported to  
5 you and whether or not anyone, especially an  
6 associate principal had been fired for any reason,  
7 correct?

8           A.     Correct.

9           Q.     Okay. And did -- so then you had a job  
10 duty for knowing that Howard Jones had been fired,  
11 correct?

12          A.     Mr. Jones was not fired. He is an  
13 assistant principal at Stratford High School.

14          Q.     Dr. Springer, you have a job duty for  
15 knowing beforehand if a letter was going to be sent  
16 to Howard Jones firing him, correct?

17          A.     For individuals that were being  
18 nonrenewed, terminated, et cetera, typically that we  
19 are made aware of these types of changes.

20          Q.     Is a nonrenewal a termination?

21          A.     No.

22          Q.     When is a nonrenewal not a termination?

23          A.     Nonrenewal? I am not an HR expert, but as  
24 I recall, being a nonrenewal, not eligible for  
25 rehire is the terminology, there is a difference.

1 Q. Okay. So then if someone is nonrenewed,  
2 typically they are not eligible for rehire, correct?

3 A. That is not correct.

4 Q. Okay. If someone is nonrenewed, are they  
5 either then eligible for rehire or not eligible for  
6 rehire?

7 A. Some staff members are eligible for rehire  
8 and some are not.

9 Q. Okay. So then if someone is nonrenewed,  
10 if they want to work for Metro Schools, they have to  
11 go in and apply like someone from -- who is not even  
12 in the school system, correct?

13 A. I think -- again, this is HR.

14 Q. Excuse me?

15 A. I thought someone was speaking.

16 Q. I'm coughing. I'm sorry.

17 A. Okay. No, an HR process and, again, I am  
18 not the HR guru, what I will say is, though, that is  
19 an HR -- that is an HR process.

20 Q. Have you ever recommended someone not be  
21 nonrenewed?

22 A. As a principal in my tenure, I am certain  
23 that I have.

24 Q. Okay. And when you say someone is to be  
25 nonrenewed, you mean you don't want them any more in

1 the school system, correct, unless they apply for a  
2 job?

3 A. That means that that individual would not  
4 return back to that school.

5 Q. Nonrenewal is not a transfer, correct?

6 A. Nonrenewal can be a transfer. That can  
7 ultimately be one of the outcomes.

8 MS. HARBISON: Ann, can we break?

9 MS. STEINER: Can I ask one question  
10 before we break?

11 MS. HARBISON: Yeah.

12 BY MS. STEINER:

13 Q. Ms. Springer?

14 A. Yes.

15 Q. Could you please stop muting your mic?

16 A. Certainly.

17 Q. You're not talking or texting with anyone  
18 in this deposition, are you?

19 A. Oh, no, ma'am. I am simply just  
20 accustomed to using Zoom, and when you're not  
21 speaking, you typically mute your mic so that you  
22 aren't, you know -- that's a typical practice, so I  
23 will maintain my mic.

24 Q. Thank you.

25 MS. STEINER: We're going to take a break

1 for just about five minutes.

2 (Brief break observed.)

3 BY MS. STEINER:

4 Q. Dr. Springer, a nonrenewal is not the same  
5 as a transfer, correct?

6 A. Nonrenewal is not the same as a transfer.  
7 A nonrenewal means you can -- you will not be coming  
8 back to the current school. You can apply -- you  
9 know, go through the process of going to another  
10 school. So to answer your question, I guess that's  
11 a yes. They are two different things, but could end  
12 up being similar, the same thing.

13 Q. But applying -- having to apply for a job  
14 is not the same thing as a transfer, correct?

15 A. I imagine in most cases, that is correct.

16 Q. Now, was it determined that Braden had  
17 sexually harassed Swindall?

18 A. I believe there was enough evidence to  
19 warrant a response, so, yes, there was evidence that  
20 was presented that Dr. Sam Braden did harass the  
21 other -- the individuals that were -- made the  
22 claims.

23 Q. Besides -- and that's sexually harassed,  
24 correct?

25 A. That was the nature of the allegation,

1 yes.

2 Q. And the other individuals, there were  
3 women who also claimed they had been sexually  
4 harassed by Braden, correct?

5 A. It was the science teacher I referred to  
6 earlier, yes.

7 Q. Okay. And then there were teachers who  
8 also alleged they were retaliated against for  
9 reporting the harassment, such as Howard Jones,  
10 correct?

11 A. Yes. Mr. Jones did state that he was  
12 being retaliated, he felt he was being retaliated  
13 against.

14 Q. And he wasn't the only one, Mr. Swindall  
15 and the two women also felt they were being  
16 retaliated against, correct?

17 A. That is, from my knowledge, I know for  
18 Mr. Swindall, that was part of his allegation, as  
19 well.

20 Q. And did Metro Schools determine that there  
21 was retaliation going on?

22 A. I do not have the HR response right in  
23 front of me, but -- so I don't have the HR response  
24 right in front of me. I do know that there was  
25 evidence that you submitted that would suggest that

1 that indeed took place.

2 Q. Okay. And when you were the executive  
3 director, who was your supervisor?

4 A. My supervisor was Dr. Adrienne Battle.

5 Q. Okay. What was her position?

6 A. At the time, her position was -- I believe  
7 they referred to as community superintendent.

8 Q. Were you told or instructed by anyone at  
9 Metro that retaliation was illegal with regard to  
10 the Sam Braden matter?

11 A. Yes.

12 Q. Who told you?

13 A. Retaliation -- HR, human resources, you  
14 know, has stated, you know, throughout my service in  
15 Metro Schools and in this regard, that retaliation  
16 is unacceptable and inappropriate.

17 Q. When Sam Braden was put back into Metro  
18 Schools after the complaints of retaliation and  
19 sexual harassment were filed, were there any  
20 protections put in place to protect the workers  
21 under him for retaliation -- from retaliation?

22 A. I can recall a conversation regarding --  
23 you know, as we would with anyone, that it will not  
24 be -- retaliation isn't tolerated, and that there  
25 should not be any discussion regarding this matter

1 with anyone in the school.

2 Q. Was there any protections put in place to  
3 stop Sam Braden from retaliating?

4 A. As a professional, when your immediate  
5 supervisor and others in the human resources  
6 department make it very clear and clarifies  
7 expectations, that retaliation is not acceptable.  
8 That is certainly a safeguard that is put in place,  
9 not only in this case, but any case in Metro  
10 Schools. And that there should not be any  
11 communication regarding this matter at all.

12 MS. STEINER: Okay. Now, could we have  
13 that complaint marked Exhibit Number 1, and then I  
14 want to show you another complaint.

15 (WHEREUPON, the  
16 previously-mentioned document was  
17 marked as Exhibit Number 1.)

18 BY MS. STEINER:

19 Q. Do you recognize this complaint,  
20 Ms. Springer? It's got Sherman Swindall, Sonji  
21 Collins, Marcus Kinnon and Scott Lindsey?

22 A. Yes.

23 Q. Do these individuals all claim they were  
24 retaliated against?

25 A. Mr. Swindall, Sonji Collins, which is who

1 I was referring to. I believe she was a science  
2 teacher. I'm not certain about Mr. Mark Kinnon and  
3 his allegation of the retaliation. Perhaps so, but  
4 if you scroll down, we can confirm one way or the  
5 other. And Scott Lindsey, I believe he is part of  
6 the -- at the time, serviced in human resources, so  
7 I am not certain what his allegation was.

8 Q. Were you aware that Scott Lindsey claimed  
9 that he found discrimination and filed the sexual  
10 conduct and that he claims he lost his job as a  
11 result of that?

12 A. I recall that being, just based upon this  
13 information, I can recall that being part of a  
14 discussion or information.

15 Q. Could we go down to the first few  
16 paragraphs really quick. Keep going. We have  
17 confirmed that Swindall did complain of retaliation,  
18 correct?

19 A. Correct.

20 Q. And you knew of that when the complaints  
21 were made, correct?

22 A. Correct.

23 Q. Okay. Keep going down. Ms. Collins, I  
24 believe she is the lady that you testified about  
25 earlier, and she claimed that he was making sexual



1 advances towards her, correct?

2 A. Correct.

3 Q. Keep going down. Okay. Do you see  
4 paragraph 33, 34 of this complaint that I'm showing  
5 you right now that sets forth the specific  
6 complaints Collins had made about Braden, that he  
7 actually threatened to grab her in front of a bunch  
8 of people?

9 A. Yes. Yes.

10 Q. And he actually said on May 23, 2017,  
11 don't make me grab you out here and kiss you; do you  
12 see that?

13 A. Yes.

14 Q. Do you know of those allegations when they  
15 were made?

16 A. Yes, when they were made.

17 Q. Do you see in paragraph 35 it says, in  
18 retaliation for rebuffing Braden's sexual advances,  
19 he began spreading false rumors about her to other  
20 teachers. Could you scroll down just a bit? Okay.

21 And he said that Ms. Collins wanted his  
22 body and that he and Collins had engaged in touching  
23 and kissing, all of which was false; do you see  
24 that?

25 A. I do.

1 Q. Okay. Did you know of these allegations  
2 when they occurred?

3 A. When I was made aware of. Not certain  
4 exactly when they occurred, if they occurred that  
5 year, a multitude of years, when I was made aware of  
6 it, that is when -- that is when I found out, yes.

7 Q. Can we go down to paragraph 39? Do you  
8 see where then she claims that he began to reprimand  
9 her with false reprimands and calling a uniformed  
10 police officer into the meetings to intimidate her.  
11 Did you know of those allegations when they  
12 occurred?

13 A. When I was made aware of, yes.

14 Q. And that's when you were the executive  
15 director over JFK, correct?

16 A. In terms of a timeline when exactly this  
17 incident occurred, specifically, I would need to  
18 know the date of that specific incident. I was the  
19 executive director over JFK when this information  
20 was shared in a formal manner.

21 Q. Could you go on down. You know that Ms  
22 Collins claimed that Braden retaliated against her,  
23 correct?

24 A. Correct.

25 Q. Go down to the next group. Go down to

1 Marcus Kinnon. Do you see where Mr. Kinnon said he  
2 transferred to JFK?

3 A. I do.

4 Q. Do you know that Kinnon claimed that  
5 Braden told him he was eye candy and that he could  
6 do to him whatever he wanted to do?

7 A. When I was -- when this was brought to my  
8 attention, yes.

9 Q. Go down. Do you see, too, where -- keep  
10 going down. Do you see, too, where Kinnon claims  
11 that Braden began to scrutinize his work when he  
12 rejected his sexual advances and that he made  
13 working conditions intolerable; do you see that?

14 A. I do see that.

15 Q. Did you know what when you were the  
16 executive director over JFK?

17 A. No. When I became aware of it is when I  
18 found out about it.

19 Q. And you were the executive director,  
20 correct?

21 A. Yes.

22 Q. Go down a bit. Do you see why it says  
23 that Swindall -- that Braden began spreading false  
24 rumors that Mr. Kinnon's partner was a pedophile;  
25 did you know that allegation?

1           A.     The only way I was made aware of this  
2     allegation is through the investigative process, and  
3     so -- and litigation process -- and/or litigation  
4     process.

5           Q.     Keep going down a bit.   Okay.   Do you see  
6     where it says Kinnon had to transfer because of  
7     mental stress he was suffering?

8           A.     I do see that in this complaint.

9           Q.     Keep going down a bit.   And did you also  
10    know that Scott Lindsey had claimed that he had been  
11    retaliated against and terminated by Metro as a  
12    result of his actions in the Braden matter?

13          A.     Only through, you know, reading documents  
14    as a part of this litigation process, like that's  
15    when I was made aware.   I was not intricately  
16    involved in that aspect at all.

17          Q.     Let me ask you a question about this.  
18    Would you not agree that the allegations against Sam  
19    Braden are egregious?

20          A.     The allegations against Sam Braden are  
21    egregious.

22          Q.     Okay.   And once you read about this, it's  
23    hard to forget about these five allegations,  
24    correct?

25          A.     You know, as with any situation, in terms

1 of like specificity and dates and times and things,  
2 those pieces may not come automatically back to the  
3 forefront, but I have a knowledge, which you have  
4 asked me about if I am aware of these allegation.

5 Q. And you were, correct?

6 A. I am, correct.

7 Q. And I assume that they're allegations that  
8 you, as well have difficulty to forget?

9 A. Can you define difficult to forget? I am  
10 very much aware of the case against Mr. Sam Braden.

11 Q. Okay. So then when I first asked you  
12 about this in the very beginning of your deposition,  
13 would you agree that your response really wasn't  
14 accurate?

15 A. Tell me more.

16 Q. Do you recall your response when I first  
17 asked you about this and you vaguely remembered it?

18 A. I don't remember using the word vaguely.  
19 Can you please tell me more?

20 Q. Do you recall at the very beginning of  
21 this deposition when I asked you about the Sam  
22 Braden matter, and you really did not volunteer much  
23 information; would you agree to that?

24 A. I answered your questions. Yes, I believe  
25 that I've answered the questions regarding the

1 incident. In the beginning, I think I was unclear  
2 about what you were asking regarding if I was  
3 involved in a litigation case, I was a bit confused.

4 Q. Now, let's have this complaint marked  
5 Exhibit Number 2 to your deposition today.

6 (WHEREUPON, the  
7 previously-mentioned document was  
8 marked as Exhibit Number 2.)

9 BY MS. STEINER:

10 Q. Ms. Springer --

11 A. Yes, ma'am.

12 Q. -- would you agree that while Sam Braden,  
13 after the complaints were made, while Sam Braden was  
14 allowed to go back into his job for a certain amount  
15 of time, that the individuals who complained,  
16 whether it be Swindall, whether it be Howard Jones,  
17 whether it be the other individuals that were  
18 involved in Exhibit Number 2, that if you complained  
19 or reported the complaints, you were either demoted  
20 or lost your job, but if you were the harasser, you  
21 kept your job for a short period of time?

22 A. Are you asking if I agree with that  
23 statement?

24 Q. Yes.

25 A. No. No. That is not exactly how I would

1 surmise what you're saying, I would say that like  
2 Mr. Jones, for instance, he did not, you know, lose  
3 his job. You know, he is still an assistant  
4 principal with Metro Schools, you know, so I do not  
5 agree with what you're sharing.

6 Q. Okay. So if that is not true, if he  
7 actually received notice that he was being  
8 terminated, then would you agree with what I'm  
9 saying?

10 A. If he agreed -- can you restate that,  
11 please?

12 Q. If Howard Jones was actually told he was  
13 fired, would you agree then that the individuals who  
14 reported, either the harassment of themselves or  
15 harassment of others, were either demoted or fired  
16 while Sam Braden kept his job for a short period of  
17 time?

18 A. No. Because to my knowledge, Mr. Jones  
19 was not demoted or fired, so, no, I would not say  
20 that. What I will say is that -- that -- no, I  
21 would not say that, no, ma'am.

22 Q. Would you agree that Scott Lindsey lost  
23 his job after filing retaliation?

24 A. I am not certain about the intricate  
25 details of the Scott Lindsey case.

1 Q. Okay. Would you agree --

2 A. I don't know if he was fired or not.

3 Q. Would you agree that the other individuals  
4 named in this complaint, the second complaint,  
5 were -- lost their jobs when they complained of the  
6 harassment?

7 A. Based on what you've shared, Mr. -- no, to  
8 that question. For an example, Mr. Kinnon, I  
9 believe mentioned he transferred to another job or  
10 another school, so, no, that statement would not be  
11 accurate based on what you shared earlier.

12 Q. When this investigation was going on, you  
13 received notice of it because you were the executive  
14 director, correct?

15 A. That is correct.

16 Q. And Dr. Battle received notice because she  
17 was the associate superintendent; is that correct?

18 A. I believe at the time, the title was  
19 community superintendent.

20 Q. And she would have received notice of what  
21 was going on with this investigation, correct?

22 A. Received updates along the way, is that  
23 what you're asking?

24 Q. Yes.

25 A. Common practice would be that she received



1 updates along with way, yes.

2 Q. And did you hear Dr. Battle make any  
3 statements that she did not believe the allegations  
4 because she knew Sam Braden?

5 A. No. I do not recall that statement being  
6 made.

7 Q. Now --

8 A. Let me be clear. The statement was never  
9 made to me.

10 Q. Do you know Dr. Leffler?

11 A. Yes.

12 Q. Okay. And my understanding is that you  
13 were promoted to be an associate superintendent; is  
14 that correct?

15 A. I was -- I served in that role as interim,  
16 yes. It was associate superintendent.

17 Q. Were you ever a community superintendent?

18 A. I believe when Dr. Battle shifted to  
19 become the interim superintendent or director of  
20 schools, I'm trying to remember if it was called  
21 community superintendent or associate superintendent  
22 at the time, I can't recall, but, yes, I served as  
23 interim superintendent during the time she took on  
24 the role in the spring.

25 Q. When did you become an associate

1 superintendent?

2 A. When she became the interim director of  
3 schools.

4 Q. And when was that?

5 A. That was back in spring 20 -- it was when  
6 the tornadoes hit, so spring of 2019.

7 Q. Now, the tornadoes hit in the spring of  
8 2020.

9 A. Pardon. Sorry, 2020. My apologies.

10 Q. Okay. And what was your position before  
11 you became an associate superintendent?

12 A. Executive director.

13 Q. Okay. So then you had only been an  
14 associate superintendent for a few months before  
15 those positions were eliminated, correct?

16 A. No. I was the interim superintendent for  
17 that spring and then that following school year.

18 Q. Okay. So then you became the associate  
19 superintendent sometime in the spring of 2019?

20 A. Yes.

21 Q. Then the tornado struck in spring of 2020,  
22 correct?

23 A. And then the pandemic hit, yes.

24 Q. Now, did Dr. Lily Leffler report to you  
25 when you were an associate or community

1 superintendent?

2 A. No.

3 Q. Were you promoted to that -- is that  
4 position, community superintendent, was that  
5 considered a promotion?

6 A. It was.

7 Q. Okay. And what was your pay as community  
8 superintendent?

9 A. Let's see. I feel like it might have been  
10 140, something around in there. I don't know if I  
11 am totally accurate.

12 Q. What is your current pay?

13 A. Current pay as chief of student support  
14 services is \$185,000.

15 Q. Okay. Who -- and did Dr. Battle appoint  
16 you as a community superintendent?

17 A. As director of schools, I remained in that  
18 role. She was director of schools, and I remained  
19 in that role after serving as interim.

20 Q. Who promoted you to be the interim  
21 superintendent?

22 A. The director of schools.

23 Q. Dr. Battle?

24 A. Yes.

25 Q. Okay. And what is your current position?

1           A.     Chief of student support services at Metro  
2 Nashville Public School.

3           Q.     When did you get this job?

4           A.     I was hired in this position, oh, fall --  
5 this is running together, fall of 2020, that's when  
6 we -- yes, fall of 2020.

7           Q.     And now you currently make 185,000?

8           A.     Yes.

9           Q.     Okay. When you were promoted to be the  
10 chief of student support services, that was  
11 considered a promotion, correct?

12          A.     Yes.

13          Q.     Okay. And you got an increase in pay when  
14 you went from associate superintendent to chief of  
15 student services, correct?

16          A.     That would be accurate.

17          Q.     And it's my understanding that you were  
18 actually appointed to that position by Dr. Battle;  
19 is that correct?

20          A.     No. Actually how it went, it was an  
21 interview process, and I was selected as the final  
22 candidate in serving in the role.

23          Q.     And what was the date of your interview?

24          A.     The date of my interview, 2020, and it  
25 was -- had to have been May 2020.

1 Q. And can you pull up -- do you have access  
2 to your calendar?

3 A. Certainly. If you want me to have access,  
4 if that's allowed?

5 Q. I would like for you to pull up the exact  
6 date of your interview.

7 A. Certainly.

8 Q. Thank you.

9 A. Give me one moment. I have it. It was in  
10 May. May 20, 2020. I should remember that.

11 Q. And who did you interview with?

12 A. Human resources and director of schools.

13 Q. Who in human resources did you interview  
14 with?

15 A. At the time, Chief Christopher Barnes.

16 Q. Do you know if anyone else interviewed for  
17 that position?

18 A. I am not certain at all.

19 Q. Did you know that HR was told when  
20 questioned about that, that you were appointed to  
21 that position?

22 A. You know, that was one of the most intense  
23 interviews that I've ever had. I was -- I don't  
24 know what you mean by appointed, but I do know that  
25 I went through an interview process, I was selected

1 as a final candidate, and now I serve in that role.  
2 That is what I know about the process, and that is  
3 typically common practice. So I am not certain who  
4 else applied, and I certainly wasn't appointed in  
5 the manner in which I'm thinking about it, because I  
6 engaged in an interview process that was quite  
7 robust and intense.

8 Q. Did you personally think Sam Braden  
9 retaliated against the employees at Metro?

10 A. Given the preponderance of evidence that  
11 was submitted, there is reason to believe that there  
12 was inappropriate action that took place regarding  
13 this case. I was not there when any of these  
14 specific incidents took place, so I did not witness  
15 them personally.

16 Q. Do you believe that Sam Braden retaliated  
17 against the employees when they complained of the  
18 harassment?

19 A. I would -- I would say that, you know,  
20 based upon, you know -- that would be determined  
21 based upon evidence, it would be determined based  
22 upon timeline, did this occur after the allegations  
23 were submitted. I don't know that Dr. Braden had,  
24 you know -- he shortly resigned after that, and so I  
25 don't know, you know, that he had time to retaliate,

1 and so, again, I do believe that there was a  
2 preponderance of the evidence that some  
3 inappropriate action did occur on behalf of the  
4 principal.

5 Q. Did anyone at Metro ask you whether or not  
6 you set back as Sam Braden retaliated against these  
7 employees and let him do it?

8 A. No. Because -- no.

9 Q. Now --

10 A. Common practice is that when you receive a  
11 complaint that you turn it over to human resources,  
12 who will then -- and do the investigation, so, no, I  
13 followed process that I knew at the time up under  
14 that leadership.

15 Q. Did you know -- I believe you testified  
16 that you knew Dr. Lily Leffler; is that correct?

17 A. Yes.

18 Q. Did she ever report to you?

19 A. No.

20 Q. Did you ever --

21 A. I served at the middle school, so she was  
22 elementary. I did work alongside Dr. Leffler for a  
23 time as executive director.

24 Q. Did you ever make any complaints about Dr.  
25 Leffler?

1           A.     I have never made a formal complaint about  
2 Dr. Leffler.

3           Q.     Did you ever make any informal complaints  
4 about Dr. Leffler?

5           A.     I do not recall making any informal  
6 complaint against Dr. Leffler.

7           Q.     Did you ever make any statements that were  
8 derogatory of Dr. Leffler?

9           A.     Dr. Leffler and I had a working, collegial  
10 professional relationship. We spent quite a bit of  
11 time together as executive directors and worked  
12 alongside one another, so, no, not that I can  
13 recall.

14          Q.     Did you like Dr. Leffler?

15          A.     Dr. Leffler was a kind employee -- not  
16 employee, excuse me, colleague. And, you know, we  
17 did work alongside one another, so, absolutely, I  
18 had nothing against Dr. Lily Leffler.

19          Q.     Did you think she was professional?

20          A.     In my interactions with Dr. Leffler and  
21 her interactions with others, I don't have any  
22 reason to believe she is not.

23          Q.     If any complaints were brought about Dr.  
24 Leffler, should they have been taken to Dr. Cathey's  
25 attention, who was her direct supervisor?



1           A.     Was that her direct supervisor? It  
2 depends on -- I don't know. It would depend on  
3 who's -- I mean, those are different factors that  
4 would need to be brought into it, who is submitting  
5 this complaint, are we talking about parent, a  
6 student, a staff member, all the things would matter  
7 in this case.

8           Q.     Do you recall informing anyone that you  
9 did not want Sam Braden disciplined?

10          A.     No. That's -- that was not my role.

11          Q.     Okay.

12          A.     That's a human resources role.

13          Q.     Dr. Leffler, did you ever make any  
14 statements to anybody that she has the inability to  
15 get along with others?

16          A.     I -- you are asking for specificity, and  
17 if -- I'm just thinking back to our interaction, you  
18 ask me if I said it. Not to my knowledge. If I can  
19 think back, it's not readily coming to the forefront  
20 of my brain.

21          Q.     Okay. Meaning you got along well with  
22 her, correct?

23          A.     Meaning we were colleagues, and I can get  
24 along well with most everyone, because we are  
25 professional and we have work to do on behalf of

1 80,000 students, so there's not much that's going to  
2 get in the way of us working together.

3 Q. Did you or anyone to your knowledge tell  
4 Dr. Battle that you were having issues getting along  
5 with Dr. Leffler because she was difficult?

6 A. Now, as we were engaged in work, since you  
7 asked it this way, we were engaged in work and  
8 engaging and trying to implement common practices  
9 across, there were times when there were, not only  
10 Dr. Leffler but others, who seemed to -- I want to  
11 use the right word here, seemed to -- derail is a  
12 strong word, but sometimes would just -- it would,  
13 you know, seem to be lack of cooperation in some  
14 areas. I want to use the right word. So, you know,  
15 we're implementing things across a hundred and  
16 something schools, we need full cooperation, full  
17 collaboration, strong expectation, and there are  
18 instances where there were executive directors that  
19 did make that difficult at times. And Dr. Leffler,  
20 you know, was a new initiative, and so most  
21 certainly there were certainly some hiccups along  
22 the way, some difficulties along the way.

23 Q. Hiccups?

24 A. Difficulties.

25 Q. Okay. Now --

1           A.     Difficulties, not difficulties that we  
2     could not overcome, but difficulties certainly that  
3     we had to work through and not -- you know, you're  
4     thinking about standardizing practice and ensuring  
5     that schools have a -- you know, the support they  
6     need, you know, leaves little room for that.

7           Q.     Who were the other executive directors --

8           A.     All right. I --

9           Q.     -- that you had difficulty with?

10          A.     I didn't have difficulty with them. I  
11     think that what was being asked of them may have  
12     been a bit difficult for them. You're asking me to  
13     name individuals. Let's see. I mean, if I were  
14     to -- let me zoom out and I can give some text. At  
15     the time, we were implementing a pretty -- it was a  
16     heavy lift, as we would call it in education. It  
17     required a different way of engaging with our  
18     schools and our school teams around analyzing data,  
19     around observing practices that are happening in the  
20     school, and thinking about outcomes for kids, and it  
21     required a very strategic step-by-step-by-step  
22     process, and it was critical that that process was  
23     executed in a streamlined fashion. And so when you  
24     think about doing that across, I don't know how many  
25     executive directors at the time, maybe 14, 12,

1 somewhere along there, more than a dozen or so, it  
2 can get difficult to ensure that there isn't  
3 variation in the way it was executed.

4 So we were in a mix of a pretty big lift  
5 at the time, and I'd say that there were several  
6 executive directors that may have struggled with  
7 that execution.

8 Q. Okay. Dr. Springer, I'm going to ask you  
9 this question again. I think it's very simple and  
10 it doesn't require a 20-minute response, okay? Who  
11 were the other executive directors --

12 MR. FOX: Objection to the form.

13 BY MS. STEINER:

14 Q. -- that you had difficulty with?

15 A. Okay. I'm going to name you the executive  
16 directors that struggled at some point from my  
17 vantage point of executing what we were required to  
18 do at the time with what the schools needed, and so,  
19 you know, there were times where Dr. Leffler may  
20 have struggled.

21 The reason why I'm pausing is because I'm  
22 thinking about all of them and why that required a  
23 20-minute response. It does require some thought,  
24 because at some point everyone struggled with this  
25 new initiative that was being put into place, and

1 so -- but I do recall Dr. Leffler being one of them.  
2 We had to work through some things.

3 I mean, virtually every last one of them,  
4 to some degree, had a struggle with this  
5 implementation.

6 Q. Okay. When did Dr. Leffler report to you?

7 A. Dr. Leffler never, as a middle school  
8 community -- I'm trying to think back, I don't  
9 recall Dr. Leffler reporting to me. I had two  
10 executive directors that reported to me and they  
11 were focused only on middle schools.

12 Q. Did you report to Dr. Cathey or to the  
13 associate superintendent, over Lily Leffler, any  
14 issue with Dr. Leffler?

15 A. I can imagine Dr. Cathey and the other  
16 superintendents, we all talked about concerns  
17 regarding -- or the need, difficulties regarding  
18 implementation of the current practice that we were  
19 working to implement.

20 Q. Okay. We're going to try this again. Did  
21 you report to Dr. Cathey or to Dr. Leffler's  
22 associate superintendent any problems you had with  
23 her job performance?

24 A. I'm having a hard time responding. I'm  
25 not certain what you're asking, because I did not

1 evaluate Dr. Lily Leffler at any time, so I --

2 Q. The question is different. Did you report  
3 to Dr. Cathey that you were having issues with Dr.  
4 Leffler's job performance? Yes or no?

5 A. I believe that in any instance, I could  
6 have. Let me be clear, not job performance, because  
7 that would assume that I am her supervisor and that  
8 I would be observing her and giving her specific  
9 feedback. In general, there was certainly feedback  
10 that I would have given every last one of the  
11 executive directors for sure. And I could have said  
12 that to Dr. Damon Cathey or any of the associate  
13 superintendents at the time, given our role.

14 Q. Would you agree that her supervisor would  
15 have more knowledge about her job performance than  
16 you?

17 A. Referring to the day-to-day execution, her  
18 direct supervisor would know more, but as a  
19 colleague and as someone who had to work alongside  
20 and know the difficulties that come along with, I  
21 certainly also would be somewhat knowledgeable of  
22 the struggle with implementation, et cetera.

23 Q. Did you keep any notes about Dr. Leffler's  
24 struggle with implementation?

25 A. That generally would not have been my

1 practice, because I didn't directly supervise her at  
2 the time.

3 Q. So there's no notes, correct?

4 A. Not to my knowledge, no.

5 Q. Can you tell me any specifics about her  
6 struggle with implementation, and by that, I mean  
7 what date did it occur and how did it occur?

8 A. Yeah. So when we implement -- the way our  
9 job was at the time, it would be, you know, multiple  
10 opportunities to collaborate as a total team, so  
11 community superintendents -- excuse me, associate  
12 superintendents and the executive directors, and so  
13 I would see difficulty with our team when we would  
14 work to collaborate around the specific initiative,  
15 and there would be pushback, there would be a lack  
16 of what seemed to be buy-in with the different  
17 initiatives that we were planning to and agreed to  
18 implement, so that is what I can recall in terms of  
19 performance or --

20 Q. So it sounds like to me what you're saying  
21 is that when you would have these team meetings,  
22 that Dr. Leffler may question some of the  
23 implementation, correct?

24 A. No. I think it's healthy to question and  
25 to, you know, probe and to engage in some critical

1 feedback and conversation, so, no, I'm talking  
2 implementation, you know, with fidelity, I'm talking  
3 there is a level of, you know, questioning and  
4 critical feedback, as I was saying, and then there's  
5 time so, okay, so what are we going to do about it,  
6 are we going to shift or are we going to implement,  
7 are we going to not implement it, so there is always  
8 going to be that level of discussion amongst a group  
9 like that.

10 Q. What --

11 A. At the end of the day, we need to be ready  
12 to execute.

13 Q. What specifically did Dr. Leffler say?

14 A. About? Can you --

15 Q. About the implementation that caused you  
16 to think there was a struggle, and what  
17 implementation?

18 A. Implementation of any initiatives. So,  
19 you know, we had a multitude of initiatives. The  
20 one specific one we were working on was the inquiry  
21 cycle, and, you know, many of the executive  
22 directors talked about it being, you know,  
23 laborious, like it just required us to work  
24 differently. It required that our calendar be --  
25 you know, that's all we did.



1           Q.    I'm going to stop you, because I want to  
2 know, what did Lily Leffler do, what did she state,  
3 what did she do with regard to the implementation of  
4 the fidelity system that caused you to think she was  
5 having a struggle?

6           A.    I think that -- you know, it's difficult  
7 to put into words and to summarize. If you are  
8 implementing a system, you know, everyone is trained  
9 on a system, one would imagine that it is time to  
10 implement, and we don't have to keep going back to  
11 try to get buy-ins and try to figure out if we're  
12 going to implement or -- you know, the system is  
13 what it is, you know. We tailored it to meet our  
14 needs, as always, worked collaboratively, but there  
15 has to be some cooperation buy-in, and we don't need  
16 to keep returning back to, you know, why do we need  
17 to do this or -- you know, there's always a concern  
18 about it.

19          Q.    I hate to interrupt you. I hate to  
20 interrupt you, Dr. Springer, but I'm afraid you're  
21 off on a half-hour explanation. What I want to know  
22 is, what specifically did Lily Leffler do or say to  
23 cause you to think she had a problem with this?

24               MR. FOX: Objection. Let the witness  
25 finish her answer. She was trying to explain the

1 situation.

2 MS. STEINER: She hasn't even mentioned  
3 Dr. Leffler. She was off and running on a totally  
4 different tangent.

5 MR. FOX: I think she was trying to  
6 explain. I'll let her, in her words, but I think  
7 she was trying to explain the question is not so  
8 simple.

9 BY MS. STEINER:

10 Q. Dr. Springer, what did Lily Leffler say to  
11 you or to anyone else that made you think she was  
12 having difficulty with this implementation, what did  
13 she say?

14 A. I mean, I agree; Brook, it isn't that  
15 simple.

16 Q. Can you recall anything she said today  
17 that you can tell me that came out of Dr. Leffler's  
18 mouth or actions she did that made you think she had  
19 problems with implementation?

20 A. Yeah. You're asking for specific quotes.  
21 I don't have quotes for you today.

22 Q. Okay. Now --

23 A. But what I will say is that, again, just  
24 to summarize what I was trying to get at earlier, we  
25 can't keep, you know, coming back to why we're

1 having to implement and what we're having to do and  
2 keep explaining as to why this is critical, and so  
3 --

4 Q. Did you tell Dr. Cathey that you were  
5 having this problem with Dr. Leffler?

6 A. I think Dr. Cathey and I probably engaged  
7 in conversation about, not only probably Dr.  
8 Leffler, but maybe others, as well. I'm certain of  
9 it.

10 Q. Did you --

11 A. We were charged -- we were charged with  
12 ensuring that our teams executed upon this  
13 initiative.

14 Q. Did you --

15 A. And so I am certain we came together and  
16 we talked about in strong words, we need a little  
17 more coaching, feedback where it's -- you know, what  
18 adjustments do we need to make, so I am certain we  
19 had plenty of conversations around just the  
20 implementation in general, and specifically our  
21 team.

22 Q. Okay. What I want to know is, did you --  
23 and this is my question, okay? I don't want general  
24 answers. I don't want a 20-minute exposé about what  
25 you do down there. What I want to know is this, did

1 you ever, at any point in time, sit down with Dr.  
2 Cathey to say, I've got a problem with Lily  
3 Leffler's implementation?

4 MR. FOX: Objection to form.

5 BY MS. STEINER:

6 Q. Did you?

7 THE WITNESS: I thought you said  
8 something, Mr. Brook.

9 MR. FOX: I said objection to form.

10 BY MS. STEINER:

11 Q. Do you want me to repeat the question?

12 A. If you don't mind.

13 Q. Did you ever, at any point in time, this  
14 is a yes/no question, sit down and tell Dr. Cathey  
15 that you had a problem with Dr. Leffler's  
16 implementation?

17 A. I do not -- I have not sat down with Dr.  
18 Cathey alone, to my recollection, to have a  
19 conversation about someone he supervises on a  
20 regular basis.

21 Q. Did you sit down with him with other  
22 people to have a conversation about Dr. Leffler?

23 A. Are you talking about the other community  
24 superintendents, associate superintendents?

25 Q. Did you -- listen here, this is my

1 question. Did you, at any point in time,  
2 communicate to Dr. Cathey --

3 A. Yes.

4 Q. -- that you were having a problem with Dr.  
5 Leffler?

6 A. That is certainly possible that I have had  
7 a conversation with Dr. Cathey and any other  
8 associate superintendent regarding our team. It was  
9 our team. And we worked together, and I would have  
10 collaborated with them, had conversations about any  
11 of our team members, to include Dr. Leffler.

12 Q. You're under oath, Dr. Springer.

13 A. That is correct. I'm trying to get at  
14 your question, I promise.

15 Q. May 24, 2022, can you specifically recall  
16 a conversation with Dr. Cathey where you told him  
17 you were having problems where Dr. Leffler?

18 MR. FOX: Objection to form.

19 THE WITNESS: Can you all confirm, when I  
20 hear objection to the form, does that mean something  
21 else is supposed to happen? I just don't want to --

22 MR. FOX: It means that opposing, Ms.  
23 Steiner, is supposed to rephrase her question --

24 THE WITNESS: Oh.

25 MR. FOX: -- or she can just keep

1 marshaling on and stand on the question she's  
2 already asked, and if so, you need to answer it.

3 THE WITNESS: Got it. Thank you.

4 MR. FOX: So sounds like Ms. Steiner is  
5 standing on the question she's already asked. She's  
6 not going to rephrase it.

7 (Requested portion of record read.)

8 THE WITNESS: I do not recall a time where  
9 Dr. Cathey and I sat down to have a specific  
10 conversation regarding Dr. Lily Leffler at length or  
11 in isolation.

12 BY MS. STEINER:

13 Q. Okay. Now, do you recall any  
14 conversations where Dr. Battle was present where she  
15 questioned the loyalty of Dr. Leffler?

16 A. I don't -- I don't recall that at all.

17 Q. Did you know Dr. Leffler had a relative  
18 who had sued the district for sexual harassment,  
19 hostile work environment and then losing her job  
20 after she complained?

21 A. I -- if you confirm for me a name, in my  
22 mind, yes, I am aware that she had a family member  
23 to work in the district and that she brought forth  
24 claims regarding -- I'm not certain what specific  
25 claims, but I am not certain regarding like losing

1 her job and all of the things, so to answer your  
2 question, you asked me if I was aware of Dr. Leffler  
3 having a family member to work in the district, I am  
4 aware.

5 Q. Okay. Are you aware of Vanessa Garcia,  
6 Dr. Garcia?

7 A. Yes. I just didn't want to assume.

8 Q. Sure. And did you know Dr. Garcia had  
9 sued the district for hostile work environment and  
10 based on sexual harassment?

11 A. Yes. Based upon, you know, news outlets,  
12 et cetera.

13 Q. Did you also know that she claimed she was  
14 retaliated against and her position was eliminated  
15 shortly after she complained?

16 A. I'm not certain about those specific  
17 details.

18 Q. But you knew that Dr. Lily Leffler was a  
19 family member of Dr. Garcia, correct?

20 A. Yes. She shared that a time or two, yes.

21 Q. Did you ever hear anybody question Lily  
22 Leffler's job performance or loyalty to the school  
23 system because of her relationship to her relative  
24 Dr. Garcia?

25 A. That is not -- no.

1 Q. Did you know that it is illegal to  
2 question -- to retaliate against somebody because  
3 they are related to someone who has a claim against  
4 the district for a violation of Title VII?

5 A. Absolutely, yes.

6 Q. Would you agree that it is illegal for  
7 someone to question Dr. Lily Leffler's loyalty to  
8 the district, Metro Schools, because of her  
9 association with her relative Dr. Garcia?

10 MR. FOX: Objection to the form.

11 BY MS. STEINER:

12 Q. Want me to repeat it?

13 A. Yes.

14 Q. Would you agree that it is illegal for  
15 someone to question Dr. Lily Leffler's loyalty to  
16 the school district based on her relationship to Dr.  
17 Garcia?

18 A. You did say it's illegal, correct?

19 Q. I'm asking you. Would you agree that it's  
20 illegal for someone to question Dr. Leffler's  
21 loyalty to the system and job performance because of  
22 her relationship to someone who had filed a Title  
23 VII complaint?

24 A. Because of her relationship, absolutely.

25 Q. Okay. Now --



1 MR. FOX: Sorry to interrupt. Ann, if  
2 you're about to move on to another topic, can we  
3 take a break. My battery on this computer is just  
4 about gone.

5 MS. STEINER: Sure. No problem. How long  
6 do you need?

7 MR. FOX: Just two minutes.

8 (Brief break observed.)

9 BY MS. STEINER:

10 Q. Dr. Springer, did you tell Dr. Battle that  
11 you were having issues with Dr. Leffler?

12 A. I don't have any specific date, time,  
13 quotes. As my supervisor, I could have shared  
14 progress regarding implementation for all of the  
15 executive director team that we worked with, so I  
16 don't have specific dates, times to share with you  
17 today.

18 Q. Okay. So it sounds like when you say you  
19 could have shared, it's just as likely that you may  
20 not have shared, correct?

21 A. No. Okay. Like the conversation before,  
22 and I don't want to belabor the point, it isn't that  
23 simple in a collaborative, collegial environment,  
24 we're going to talk about implementation, we're  
25 going to talk about what's going well, what do we

1 need to tweak, what's up next for us, what's our  
2 next level of leadership as a team, and so I can  
3 imagine that we've had conversations about the  
4 multitude of staff.

5 Q. Can you recall today any conversation you  
6 had with Dr. Battle where you brought up Lily  
7 Leffler and said that you were having issues?

8 A. I don't have a date and a time. I can  
9 imagine, given some of the difficulties that  
10 executive directors have experienced, then we most  
11 certainly could have had a conversation about them  
12 all, including Lily Leffler.

13 Q. Okay. Now, but you don't recall any  
14 specific one where you only said, I'm having issues  
15 with Leffler, I want to tell you this, correct?

16 A. So much has occurred. You're asking about  
17 a specific date, time, place, not that I can  
18 definitely recall in this moment.

19 Q. Okay. Now, when you were in charge of --  
20 when you were the associate superintendent or the --  
21 what was the other one called before you became a  
22 association superintendent, what was that called?

23 A. Executive director? Executive director?

24 Q. Yeah. Either executive director, and then  
25 you became the community superintendent?

1           A.     The name changed -- no. I think interim  
2 community superintendent, then the name changed to  
3 associate superintendent, if I can recall.

4           Q.     Okay. And you handled, was it middle  
5 schools?

6           A.     Yes.

7           Q.     Did some of those schools -- did you  
8 handle all of the middle schools?

9           A.     In general, yes. Yes. All middle schools  
10 except for schools of innovation. They had their  
11 own kind of leader in place.

12          Q.     Did some of your schools become schools of  
13 innovation?

14          A.     Just thinking. Tell me more. Like are  
15 you saying during the time they were under -- are  
16 you saying did they end up getting added to a list  
17 of -- can you restate your question?

18          Q.     When you were either the associate  
19 superintendent or the community superintendent, did  
20 some of the schools that reported to you, some of  
21 the middle schools, did they become priority schools  
22 at any point in time?

23          A.     Yes.

24          Q.     Which school was that?

25          A.     I believe that was Antioch Middle.

1           Q.     And who was the principal at Antioch  
2 Middle?

3           A.     At the time, it was Dr. Celia Conley.

4           Q.     And do you know --

5           A.     I don't believe -- I don't believe Wright  
6 Middle School was on that list. It doesn't take  
7 much to get on that list. You close a school down  
8 in another county, you're going to be added to a  
9 list, so...

10          Q.     I understand that.

11          A.     Oh, sorry.

12          Q.     I just don't know the lingo. What were  
13 you saying?

14          A.     I was just saying with, you know, how the  
15 process is, a school can -- you know, there are so  
16 many slots, is what I'm trying to say, there are so  
17 many slots of schools that end up on a priority  
18 list, which is schools of innovation, and so, you  
19 know, if a school closes down and that opens up  
20 another spot, somebody has to be added, or except --  
21 I'll just give you a quick example. But really  
22 neither here nor there, I would say Wright Middle  
23 School, I think, ended up being added later on after  
24 I, you know, shifted.

25          Q.     I guess what I'm saying is, I don't

1 understand your answer, because you said you closed  
2 a school and someone else has to be added. What do  
3 you mean by that?

4 A. I didn't close a school. Like, for  
5 example, if a school district closes a school in  
6 another county, right, for the state, there are a  
7 certain number of schools that will be added to the  
8 priority list, bottom 5 percent, I believe, and so,  
9 you know, if another school drops off of a list in  
10 another county or -- right. So it just opens up  
11 slots. I'm going back to my days as a principal  
12 when I had to deal with something similar.

13 Q. Okay. I think I understand you. So then  
14 if you have, for instance, ten priority schools in  
15 Memphis that drop off the list, then that opens up  
16 ten slots for someone else to fall into the bottom  
17 five, correct?

18 A. That used to be how that worked when I was  
19 principal.

20 Q. Okay.

21 A. And you mentioned -- yeah. There are so  
22 many different nuances, I can't even begin to give  
23 you incidents, but that could be one scenario for  
24 sure.

25 Q. Okay. And then just because a school then

1 falls into priority status doesn't necessarily mean  
2 anything has changed at the school, it could just  
3 mean that there is more openings for some to go into  
4 that status, correct?

5 A. Correct. Or that there were changes, yes,  
6 and/or there were changes to that school.

7 Q. And if you are a school of innovation, is  
8 that something that helps the school, does that mean  
9 you're going to get additional funding from the  
10 State?

11 A. I believe schools of innovations get more  
12 funding from the State. I wasn't involved in -- you  
13 know, I'm just not sure about the specifics of that.  
14 Seems like to me the school would receive more  
15 funding.

16 Q. If there is a school of innovation and  
17 someone falls into the priority list, does Metro  
18 Schools, to your knowledge, draft a plan for how  
19 that they can get off or out of the -- do they  
20 create a plan that includes something called a  
21 capacity review to get the school out of priority  
22 status?

23 A. I'm not certain if that was the name of  
24 it.

25 Q. Okay. But do they do something that

1 creates a plan to get the school out of priority  
2 status?

3 A. Yes.

4 Q. Okay. And when they do that, do different  
5 people from Metro go into the priority schools to  
6 find out what's going wrong and how to get it turned  
7 around?

8 A. Yes. Yes. Within the district, external  
9 might be involved.

10 Q. So it's both internal and external,  
11 correct?

12 A. Can be. I gave you a scenario where it  
13 can be, yes.

14 Q. Did you ever know a school to go priority  
15 when there was not a plan created?

16 A. I'm trying to understand the question.  
17 Can you restate your question, please, ma'am?

18 Q. Did you ever know of any situation where a  
19 school may have become priority, become a priority  
20 school, but yet there is a failure to implement a  
21 plan?

22 A. You're saying -- let me make sure I heard  
23 this right. You're saying a school becoming a  
24 priority school because they didn't implement a  
25 plan.

1           Q.    No.  I'm saying a school -- let me see, if  
2 a school, because I don't quite understand this, if  
3 a school is -- how does a school become priority?

4           A.    They utilize -- again, I am out of the  
5 loop.  I'm not certain if this has changed at this  
6 point for the specific details, but I believe it's  
7 about achievement, I believe it's about growth, and  
8 absolutely about academic performance from my  
9 understanding.

10          Q.    And does the school have to be a lower  
11 performer for three years before it's designated  
12 priority?

13          A.    That was the formula.  I believe here  
14 recently, that may have shifted.  It might be two  
15 years, I'm not certain.

16          Q.    Was that the formula back in 2020 when you  
17 were the associate superintendent?

18          A.    That sounds -- no.  You're asking if the  
19 school has to be in priority status for three years  
20 for what now?

21          Q.    No.  That's not my question.  It's my  
22 understanding that a school has low grades for three  
23 years before it's designated priority; is that right  
24 or is that wrong?

25          A.    Yeah, I think so.  Yes.



1 Q. You think that's right?

2 A. I believe so.

3 Q. And then when it's designated priority,  
4 the school typically gets the designation in the  
5 next school year, correct?

6 A. Correct.

7 Q. Okay. And then the plan is implemented by  
8 the internal, external individuals to try to get the  
9 school back on track and out of priority, correct?

10 A. Correct.

11 Q. And it takes several years for the -- it  
12 takes about a year to try to figure out the  
13 implementation of the plan and then it takes several  
14 years to turn the school around, correct?

15 A. Research would say three to five years.

16 Q. Three to five years? Okay. So then if a  
17 school becomes priority for instance in the fall of  
18 2019, based on your knowledge, it's going to be at  
19 least three to five years from that before it would  
20 be able to be turned around, correct?

21 A. Yeah. There's no way to tell how many  
22 years. Research says three to five, then less than  
23 that.

24 Q. But it could be also more than that,  
25 correct?

1           A.     It could more, yes.

2           Q.     Do you know whether or not a timeline is  
3 implemented where you're telling the school, we'd  
4 like to be at this point by such and such date, and  
5 this point by another date; do you know about that?

6           A.     Yeah. Schools set yearly goals. That's  
7 accurate.

8           Q.     Okay. Now, for the 2019, 2020 school  
9 year, it's my understanding and correct me if I'm  
10 wrong, but let's see if it's your understanding,  
11 too, that the State said they weren't going to count  
12 any of the scores that year towards priority status?

13          A.     You're talking about 2020? From my  
14 understanding, yes.

15          Q.     2019, 2020 school year.

16          A.     That sounds about right.

17          Q.     Okay. That is the spring where COVID hit;  
18 do you recall that?

19          A.     That's right, yes.

20          Q.     And Metro Schools shut down for that  
21 spring, correct?

22          A.     Yes.

23          Q.     And do you recall the State telling Metro  
24 Schools, and you being informed as an associate  
25 superintendent, that none of the testing here is

1 going to count towards the priority schools this  
2 year because we can't do testing?

3 A. Right. Can't do testing.

4 Q. Okay. And so then it would take an extra  
5 year, not only through three to five years, but if  
6 you had a school that became priority prior to  
7 COVID, it would take probably an additional year to  
8 get them out because you can't do the testing?

9 A. Right.

10 Q. Okay. Have you ever had a school where --  
11 that reported to you where the school didn't have  
12 certain teachers like math teachers? Do you  
13 remember having trouble finding them?

14 A. Yes. Yes. I mean, as a principal, as a  
15 former teacher, absolutely. There are times when  
16 schools are not fully staffed.

17 Q. Would you agree that it is hard to score  
18 well, students to score well, for instance math, if  
19 they don't have math teachers?

20 A. I can't -- there are so many different  
21 factors that are included in that, that I can't --  
22 there's no definitive answer to that.

23 Q. Okay. Now, I want to talk to you just a  
24 little bit about the two high schools that you said,  
25 hang on a second, let me try to find something

1 really quick.

2 Did Brick Church report to you by any  
3 chance?

4 A. No.

5 Q. Was that a yes or a no?

6 A. My apologies. No.

7 Q. Okay. Antioch did, correct?

8 A. Yes.

9 Q. And Antioch became priority, what year; do  
10 you recall? Was it about 2018?

11 A. 2018, 2019, around there, yes.

12 Q. Okay. And Celia Conley was the principal  
13 when it became -- she'd been principal there from  
14 2015 through the 2019, 2020 school year; is that  
15 correct?

16 A. I'm not certain when she began being the  
17 principal there, but that sounds about right, based  
18 upon what I think.

19 Q. Okay. And did anyone -- and Celia Conley,  
20 do you know what happened to her in the end of the  
21 2019, 2020 school year, why she left Antioch?

22 A. I believe Celia -- I'm trying to remember  
23 my dates. Celia shifted into another role within  
24 the district, as far as I can recall.

25 Q. Okay. Do you know if she was put in that

1 role or if she had to apply for that role?

2 A. I'm not certain.

3 Q. Do you know if --

4 A. I can imagine, and it's common practice,  
5 based on my own experience, there was an interview  
6 process, but I don't know who all was interviewing,  
7 because I just -- I didn't keep up with that, but  
8 there is an interview process for these roles.

9 Q. Was she transferred into the executive  
10 director's role?

11 A. You're using the word "transfer," and I  
12 want to make sure I know what you're saying. She,  
13 from my understanding, left her school as a  
14 principal and, you know, HR hired whatever now is  
15 the executive director and has been in that role  
16 since then.

17 Q. Okay. Hang on one second. I'm sorry.  
18 Now, did you discipline Ms. Conley in any manner  
19 because her school was in priority status?

20 A. Discipline?

21 Q. Yes. Did you write her up or counsel with  
22 her because her school was in priority status?

23 A. Unless there is -- you know, we are a  
24 district that's about continuous improvement, we're  
25 about -- you know, so...

1           Q.    Did you discipline Ms. Conley at all or  
2   counsel with her because her school was in priority  
3   status?   (Technical interruption.)

4           A.    I did not discipline as in formal  
5   reprimand; counsel as in coaching and feedback which  
6   is a regular part of the process, yes.

7           Q.    But you coach and have feedback for all  
8   your principals, correct?

9           A.    Certainly.

10          Q.    Now, did you consider nonrenewing  
11   Ms. Conley because the school was in priority  
12   status?

13          A.    Yeah.  No.  That's really -- no.  No.  In  
14   that, I think I mentioned earlier that, you know, is  
15   there any progress, or, you know, sustainable  
16   progress, so, no I did not.

17          Q.    Now, it's my understanding from my  
18   clients, and correct me if I'm wrong on this, but  
19   typically the principals at priority schools are not  
20   disciplined for that and they typically, because --  
21   is that true?  Have you ever heard of anyone being  
22   nonrenewed because their school was in priority  
23   status?

24          A.    Yeah.  I -- under my middle schools, that  
25   is not a practice that has taken place.  It is a

1 practice that could happen in other instances, based  
2 upon additional circumstances that might warrant  
3 that.

4 Q. Okay. Now, let me ask you about this.  
5 When the child is getting an education, would you  
6 agree that their grade school education is just --  
7 and middle school education, is just as important as  
8 a high school education?

9 A. Yes.

10 Q. And would you agree that's because the  
11 child has to have a good foundation that's set early  
12 to build upon?

13 A. Yes.

14 Q. Okay.

15 A. And in addition to -- in addition to  
16 partnership with, you know, parents and community.  
17 Like, it will take the whole village.

18 Q. Sure. So then if someone told you that  
19 high schools were more important than grade schools,  
20 would you not agree that the grade schools are just  
21 as important?

22 A. Yeah, I'd need to know like context to  
23 that. Can you tell me more about the context? I  
24 don't...

25 Q. In terms of educating a child, would you

1 not agree that grade school education and middle  
2 school education is just as important for setting  
3 the basic tools they can use in high school?

4 A. Elementary schools, middle schools are  
5 critical, and so are high schools, yeah.

6 Q. Now, I want to ask you about this Wright  
7 Middle School, did you know that Wright actually did  
8 go into priority status in 2018; do you recall that?

9 A. Yes. That's what I was getting at  
10 earlier.

11 Q. And for Wright Middle School, it looks  
12 like there was someone named Erin Anderson that was  
13 the principal?

14 A. Yes.

15 Q. Do you recall that?

16 A. Yes.

17 Q. And then it went to Sharada Deaton?

18 A. Yes.

19 Q. Do you know what happened to Erin  
20 Anderson, why she left?

21 A. I believe that Erin Anderson, she became  
22 an executive director. Yes. She became an  
23 executive director, and then from executive  
24 director, she was principal at Oliver Middle School.

25 Q. Okay. So when she left Wright, she became



1 an executive director and then she became a  
2 principal, correct?

3 A. Yes, ma'am.

4 Q. So that was a promotion, correct?

5 A. From?

6 Q. Principal at Wright to executive director?

7 A. Yes.

8 Q. Same thing for Ms. Conley, when she left  
9 from principal at Antioch to be an executive  
10 director, that was a promotion, too, correct?

11 A. Yes.

12 Q. Okay. Now, I want to -- did anyone from  
13 Metro tell you that you needed to nonrenew Sharada  
14 Deaton when she was the principal at Wright?

15 A. No. There was not a discussion. No one  
16 informed me to do that.

17 Q. If they had, would you have done that?

18 A. I am at the direction of our human  
19 resources department regarding staffing, and so, you  
20 know, I would include human resources in that  
21 conversation. And a hypothetical question kind of  
22 like that, I don't -- I don't know how to answer it.  
23 I would confer with the human resources department.

24 Q. Did you know of any reason -- did you  
25 personally know of any reason why Sharada Deaton

1 should be nonrenewed?

2 A. I don't personally know of a reason why.  
3 Again, given, you know --

4 Q. Okay.

5 A. -- progress, et cetera, performance, et  
6 cetera.

7 Q. Okay. I am going to share a screen with  
8 you. Can you see this screen that has a lot of red  
9 on it? It has the school listed.

10 A. Can you make it just a tad bit --

11 Q. How is that? Is that better?

12 A. No. It actually went smaller on my  
13 screen.

14 Q. Hang on. I can do this. Okay. Can you  
15 see it now?

16 A. Yes, I can.

17 Q. Okay. This is a list of the priority  
18 schools that was given to us by Metro Schools, and I  
19 want to know which one of these schools would have  
20 reported to you before they went to priority status.  
21 Do you see number six is Antioch?

22 A. Uh-huh, yes.

23 Q. I believe you've already told me that was  
24 one of your schools, correct?

25 A. Correct.

1 Q. What about Bailey?

2 A. No.

3 Q. McKissack?

4 A. No.

5 Q. Bellshire?

6 A. No.

7 Q. Any other school listed on this list that  
8 would have reported to you?

9 A. I'm looking at the list. Haynes. Haynes.

10 Q. Okay. So we've got Antioch and we've got  
11 Haynes, and it looks like if you go down further, do  
12 you see Wright on there, too?

13 A. I do see Wright, yes.

14 Q. That could have been my issue. I may not  
15 have scrolled down enough for you.

16 A. I didn't see it at first. I could have  
17 missed it.

18 Q. Okay. These schools reported to you,  
19 correct?

20 A. Correct.

21 Q. Okay. Now, for Haynes, I want to pull  
22 this across. For Haynes, do you see where they had  
23 Conidra McGuire as principal, and then it switched  
24 to Iris Olige, I believe. Do you know what happened  
25 to Ms. McGuire, why she left?

1           A.     That last name isn't familiar. Canidra is  
2 familiar, Henderson, at the time. She left and went  
3 to Memphis, I believe.

4           Q.     Okay. Did you -- was she nonrenewed or  
5 did she leave voluntarily?

6           A.     She left voluntarily from my  
7 understanding.

8           Q.     Now, do you see Iris that's there, and it  
9 looks like principal for 2017? Do you know who that  
10 is?

11          A.     I vaguely know who that is. She wasn't  
12 there when I was there, so I don't...

13          Q.     And then do you see Robin Allen was there  
14 for two years?

15          A.     I do see that.

16          Q.     Do you know why Ms. Allen left?

17          A.     I don't.

18          Q.     Was she nonrenewed?

19          A.     I'm not certain. I don't know why she  
20 left.

21          Q.     If she had been nonrenewed, would that be  
22 something that you would be aware of?

23          A.     Not if I wasn't serving that role at the  
24 time.

25          Q.     Robin Allen, she was principal in 2019.

1 You were the community superintendent for that year,  
2 correct?

3 A. 2019, yes, but that -- I did not appoint,  
4 I did not -- she wasn't interim while I was there.

5 Q. Okay. We're going to have this list,  
6 Excel spreadsheet marked Exhibit Number 3 to your  
7 deposition.

8 (WHEREUPON, the  
9 previously-mentioned document was  
10 marked as Exhibit Number 3.)

11 BY MS. STEINER:

12 Q. Now, I want to show you one other  
13 document. Do you see this document that's on the  
14 screen now, can you see it?

15 A. It's small.

16 Q. Do you want me to try and make it bigger?

17 A. Please, if you don't mind.

18 Q. I will. Well, looks like my screen has  
19 frozen up. I will get out and go back in.

20 A. No problem.

21 Q. Can you see this now?

22 A. I can.

23 Q. Do you know what these numbers are, what  
24 this is a chart of?

25 A. No. Can you explain, please?

1 Q. Okay. Are you familiar with these  
2 rankings that they give schools, 3.3, 3.6, 5.1, 3,  
3 for priority schools?

4 A. That doesn't look familiar. Can you share  
5 please, what that is? Is that the level of growth?

6 Q. Let me put it to you like this. Do you  
7 see Wright Middle School, do you see where its  
8 number in column G is a 2.2?

9 A. I do see 2.2.

10 Q. That says it was the 2016 and 2017  
11 ranking?

12 A. Uh-huh.

13 Q. Do you know what that is by any chance?

14 A. No.

15 Q. Do you know whether or not Metro Schools  
16 has the priority schools ranked in terms of how they  
17 were doing?

18 A. That's what you're saying. Yes. There's  
19 a multitude of, I don't know, interworkings. At  
20 '16, '17, I was a principal in a school, so I don't  
21 really know -- you know, that looks like it could  
22 have been like where they fall in the priority  
23 ranking that we were speaking of earlier in the  
24 conversations.

25 Q. Can you see for Antioch, it looks like its

1 ranking in '17, '18 was a 5.1?

2 A. I do see that.

3 Q. Then if you go down to Wright Middle  
4 School, it looks it was a 2.2, and then the next  
5 year it went down to 1.8; do you recall that?

6 A. I see that.

7 Q. Do you recall that occurring?

8 A. Yes. So that specific number -- so that  
9 very well looks like, based upon this document that  
10 you have, that is exactly what occurred.

11 Q. Did any -- and the other school you had  
12 was Haynes; is that correct?

13 A. Uh-huh.

14 Q. Can you see Haynes Middle School, the  
15 numbers are 2.5 and 1.7?

16 A. I do.

17 Q. Did anyone from Metro talk to you about  
18 any of the schools that you had that had gone to  
19 priority about nonrenewing the teachers?

20 A. Nonrenewing the teachers?

21 Q. Uh-huh?

22 A. As a whole? Individual? Can you be more  
23 specific?

24 Q. Any of these teachers, the one that was at  
25 Antioch, the one that was at Haynes, or the one that

1 was at Wright.

2 A. When you say "the one?"

3 Q. Whoever the principal may have been.

4 A. Oh, the principal. You said teacher.

5 Okay. Yes. Certainly -- no. In terms of a  
6 conversation about nonrenewal, what the conversation  
7 always is, is around continuous improvement, and so,  
8 you know, we don't -- we not only utilize, you know,  
9 one data point, we utilize multiple data points.

10 And as you can see, you know, again, it's just not  
11 that simple, I can imagine.

12 Q. Okay. And that's multiple data points  
13 created over multiple years, correct?

14 A. And across multiple different areas, so,  
15 yeah.

16 Q. Okay. And let me show you one more  
17 document. And I'm going to mark that Exhibit Number  
18 4.

19 (WHEREUPON, the  
20 previously-mentioned document was  
21 marked as Exhibit Number 4.)

22 BY MS. STEINER:

23 Q. I'm getting towards the end. Okay. Can  
24 you see this document?

25 A. You'll have to make it larger, please.



1 Q. Okay. Can you see this document?

2 A. I do.

3 Q. Do you see where it says Haynes Middle  
4 School, and it's got it at F is the percentile, the  
5 current percentile, I believe, for Haynes Middle  
6 school. Do you see where it's got it at .2?

7 A. .2. Okay. Yes.

8 Q. And do you see where it says percentile  
9 rank prior to that was 1.4; do you see that?

10 A. Yes.

11 Q. Did you consider that to be -- did you --  
12 what do you think about those numbers?

13 A. Here is what I think about these numbers.

14 Q. Uh-huh.

15 A. I mean, numbers, there are multiple  
16 factors that go into success, right, so there are  
17 success rates and percentiles, there's TVAAS, there  
18 is on the ground observation and performance, and  
19 there are times when schools have taken a dip for  
20 whatever reason. There are times when schools have  
21 improved for whatever reason. And there are  
22 decisions that have to be made one way or the other,  
23 so when I look at these scores, I'll want to preface  
24 this by saying there are multiple modes of  
25 performance and that's what I -- when I look at

1 these scores, and, you know these scores didn't get  
2 like this overnight. And the one year that I was in  
3 that role or anyone in that role, it's the multiple  
4 years, is what we would probably look for across,  
5 you know, a multitude of data points.

6 Q. Okay. So then if you had a school that  
7 went in priority status in the 2017, 2018 school  
8 year and were told about that in the fall of 2018,  
9 you're still looking at several years to get out of,  
10 that correct?

11 A. Perhaps. I'm going to take -- you know,  
12 there are particular situations where there are  
13 instances where schools don't take that type of time  
14 to get out of that status. I've seen it as, you  
15 know, quick as under a year, and the school still  
16 was taken over or the school still was in priority  
17 status but were making gains, right, and so there  
18 are a multitude of ways that a school can make  
19 gains.

20 There's a period of transformation that  
21 must take place, and sometimes we have the right  
22 leader in place, sometimes we don't, and sometimes  
23 it just takes some time to make the necessary  
24 adjustments and improvements.

25 Q. Okay. What is your relationship to Dr.

1 Battle?

2 A. Dr. Battle, of course, goes without saying  
3 that she is the director of schools, goes without  
4 saying that we have a collegial, professional  
5 working relationship, that we work closely together  
6 on a multitude of initiatives. You know, at the  
7 point I met Dr. Battle, I was in -- and started  
8 working very closely with her as an executive  
9 director, you know, we began to align practices and  
10 work as a team alongside some of our other executive  
11 directors, so I would categorize our leadership as a  
12 collegial, professional working relationship.

13 Q. Do you consider her a friend?

14 A. I consider her -- you know, I consider Dr.  
15 Battle a -- you know, again, I don't dislike Dr.  
16 Battle, you know, we get together as a cabinet team  
17 on multiple occasions to build relationships, so,  
18 yes.

19 Q. Okay. Yes, you do consider her a friend,  
20 correct?

21 A. So I -- everybody's definition of a friend  
22 is different. So if you have a definition of a  
23 friend, we can talk through that, but what I will  
24 say is that we have a professional, cordial,  
25 collegial, friendly, professional working

1 relationship, and we work long hours together to  
2 ensure the success of 80-something-thousand kids.

3 Q. Do you go get lunch with her; yes or no?

4 A. It's not as simple as that, I just had  
5 lunch with her yesterday and --

6 Q. Okay. Do you go to dinner with her? Do  
7 you go to dinner with her?

8 A. I just need to finish. So yesterday I had  
9 lunch with Dr. Battle and I also had lunch with the  
10 entire cabinet. Yes, I've had dinner with Dr.  
11 Battle, and I've had dinner with the entire cabinet,  
12 and we've had it as a team. Lunch, breakfast, you  
13 name it.

14 Q. Were you aware of Dr. Battle meeting  
15 school board members to discuss issues that's not  
16 meeting with them one-on-one?

17 A. You mean, like in a one-one-one meeting?

18 Q. Yes.

19 A. I believe that is her protocol, their  
20 protocol where they connect on a regular basis  
21 one-on-one.

22 Q. And do you know whether or not they  
23 discuss issues that are going to be brought up at  
24 the school board meeting in the televised meetings?

25 A. Now, I am not in the meetings with them,

1 so I don't even want to speak on what they could be  
2 speaking about in their one-on-one. I can imagine,  
3 for effectiveness and efficiency, that there would  
4 be -- maybe they'd have questions, you know, need  
5 some clarification during that time frame.

6 Q. Do you know why she only meets with them  
7 one-on-one, why she doesn't meet with two of them?

8 A. Not certain. That sounds like that's a  
9 reporting structure that's in place, similar to any  
10 other reporting structure that's in our -- in our,  
11 you know.

12 Q. Now, going back to this chart, do you see  
13 where Haynes Middle went from 1.4 to .2; do you know  
14 why?

15 A. Yeah. You know, there is always -- data  
16 tells a story. And what I can recall at the time,  
17 there were, you know, students who came in and they  
18 were from various areas, I think they had a few  
19 buses -- I'm just thinking about the makeup of the  
20 school, buses, they had students who lived in the  
21 neighborhood, so, you know, just a coming together  
22 of students who may or may not typically live  
23 together, which always requires a real strong kind  
24 of, you know, culture, sense of belonging, et  
25 cetera.

1           I would categorize Haynes as a school that  
2 certainly needed some improvement. No school is  
3 perfect, and certainly needed to see some growth and  
4 achievement and culture-building in that school.

5           Q.    Do some --

6           A.    I remember dedicated, you know, teachers,  
7 staff. Uh-huh.

8           Q.    So do principals end up in schools that,  
9 because of the student population and the community  
10 around the school, have a more difficult time  
11 keeping the school out of priority status as opposed  
12 to Palmer School over in Belle Meade?

13          A.    I'm not familiar with that school, but my  
14 estimation, and even what's going on now, like  
15 societal issues, ills that are happening, things  
16 that are concerning familial structure, community,  
17 et cetera, certainly impact outcomes in schools  
18 which is why we want to emphasize partnerships. We  
19 want to emphasize approaching improving schools from  
20 a community-based, you know, approach.

21               And sometimes, you know, I'm just going to  
22 tell you, there are years in schools where you've  
23 worked as hard and done all you can do and you meet  
24 the mark, and there are some times when you don't,  
25 and that's just that.

1 Q. And sometimes when you don't meet that  
2 mark, it's not necessarily any fault of the  
3 principal, correct?

4 A. You know, it depends on -- this is a  
5 situational situation, so I cannot generalize in  
6 that way. That's very difficult to do. I can't  
7 generalize that. That's an individual scenario with  
8 the school. It depends on various different  
9 factors.

10 Q. Do you recall counseling with the  
11 principal at Haynes Middle when it went from a 1.4  
12 to a .2 about what had happened?

13 A. We, you know, stay in constant  
14 communication with administration in these roles  
15 about continuous improvement.

16 Q. If a school is not given a plan, would you  
17 agree that it would be very difficult to get out of  
18 priority status when there's no plan in place?

19 A. When you say "no plan," can you please --  
20 like, I don't know what that means. What kind of  
21 plan are we talking about?

22 Q. Did we not talk --

23 A. We have the school improvement plan in  
24 place to improve --

25 Q. Did we not talk just about an hour ago

1 about a plan being developed from internal and  
2 external individuals that are then -- that's then  
3 used in a priority school?

4 A. I believe that we were referring to  
5 supports. We have internal supports and external  
6 supports. I believe you asked if they were coming  
7 in supporting schools, so it would be an internal  
8 lens sometimes -- I mean, all the time, and then  
9 sometimes there's an external lens that comes along  
10 with that.

11 Q. So then do you know that priority schools  
12 are -- the plans developed for priority schools?

13 A. Every school should have a school  
14 improvement plan, and it should be aligned to the  
15 data that is before it. So every school should have  
16 a school improvement plan, that is correct.

17 Q. If a school does not have a plan in place,  
18 would you agree that they would have more difficulty  
19 getting out of priority status?

20 A. I just don't know of a school that doesn't  
21 have a school improvement plan in place. That's a  
22 hypothetical scenario, so that's not --

23 Q. If you --

24 A. A school principal is -- a school  
25 principal is really like -- you know, having been a



1 principal, like, right, you've got your plan.

2 Everybody has a yearly plan to execute.

3 Q. Okay. Is there any special plan that's  
4 developed for priority schools?

5 A. Yes. There are additional conversations,  
6 ATSI plans, there are additional layers to those  
7 documents.

8 Q. Okay. Is it called an ATSI plan?

9 A. That name changes so often, I don't know  
10 what it's called at this point.

11 Q. Okay. Let's call it priority plan, okay,  
12 for purposes of this deposition. Can we agree to  
13 that? Dr. Springer?

14 A. It's your decision. If you decide to call  
15 it that, yes, ma'am, I'll go with it.

16 Q. Okay. I'm trying to communicate with you,  
17 because if it changes its name every year or so,  
18 it's very difficult to get a straight answer about  
19 it. So I'm going to call it a priority plan, okay?

20 A. Okay.

21 Q. Okay. Would you agree that it would be  
22 difficult for a school to get out of priority status  
23 if the school is not given a priority plan?

24 A. See, that question is -- that's really not  
25 how it works. The school comes up with a

1 collaborative -- like it comes up with a plan, so  
2 when you're saying "given a plan," I'm just not  
3 certain what you mean by that, which is why I asked  
4 the question about, is there a different plan we're  
5 talking about? Like what plan --

6 Q. So what you're saying is that these  
7 priority plans are written by the principal who has  
8 the prior school?

9 A. I'm saying, in collaboration with others  
10 that support and serve the school.

11 Q. And who are the others?

12 A. It depends.

13 Q. Okay. Are they internal and external  
14 people who come in to support the priority schools?

15 A. That sometimes is the case.

16 Q. Okay. Do you know whether or not they  
17 develop the plan for the principal to then  
18 implement?

19 A. Who is "they?"

20 Q. These internal and external individuals  
21 that you're referring to?

22 A. My understanding is that this is a  
23 collaborative process, so not following exactly what  
24 you're saying.

25 Q. Okay. Never mind. Let's have this chart

1 marked the next-numbered exhibit.

2 (WHEREUPON, the  
3 previously-mentioned document was  
4 marked as Exhibit Number 5.)

5 BY MS. STEINER:

6 Q. Did you know an individual named Jane Doe?

7 A. Yes.

8 Q. We're going to refer to her as Jane Doe in  
9 this deposition, can we agree to do that?

10 A. Yes, ma'am.

11 Q. So do you know Jane Doe?

12 A. I do.

13 Q. Did you know that she complained that a  
14 lesson plan given to her son was racial  
15 discrimination because of the language contained  
16 within the lesson plan; did you know that?

17 A. I am aware of an incident involving a  
18 lesson plan that you are describing.

19 Q. Okay. Was the lesson referred to as  
20 "Let's Make a Slave"?

21 A. That sounds about right.

22 Q. And did you know that Jane Doe complained  
23 about that lesson to the administration at Metro  
24 Schools?

25 A. No.

1 Q. How did you know about the lesson plan?

2 A. If I'm not mistaken, in this role, we'll  
3 get litigation holds, and then, you know, things are  
4 widely televised. At the board meeting, there was  
5 conversation regarding -- regarding a lesson plan,  
6 so that's where I have been made aware.

7 Q. Did you know that there was a litigation  
8 hold placed on information related to Jane Doe's  
9 complaints?

10 A. I believe so, yes.

11 Q. Do you know whether or not there was a  
12 video of one of the lessons given?

13 A. I'm aware of a video.

14 Q. Okay. Are you familiar with a school  
15 called Stratford or Stanford, I believe? Stanford?

16 A. Stanford, yes.

17 Q. Is that a -- what type of school is that?

18 A. Stanford, assuming you're referring to, is  
19 it a Montessori school, et cetera, it's a Montessori  
20 school.

21 Q. Is it more difficult to get in?

22 A. I'm not sure. It's a process.

23 Q. Meaning you have to apply to get in that  
24 school?

25 A. Correct.

1           Q.     Would school choice decide whether or not  
2 you get in that school or not?

3           A.     I'm sorry?

4           Q.     Would school choice, the department of  
5 school choice make any decision about whether or not  
6 you get in that school?

7           A.     From my understanding, yes.

8           Q.     Okay. And if school choice does not put  
9 you in that school, you don't get in that school,  
10 correct?

11          A.     I'm not sure about the inner workings of  
12 that department.

13          Q.     Is that a school that parents want their  
14 kids to attend?

15          A.     I think there are a multitude of schools  
16 that parents want their kids to attend, and I'm  
17 certain Stanford is one of them.

18          Q.     And do you know whether or not each year  
19 you have a waiting list of kids trying to get into  
20 Stanford?

21          A.     As with all of our school choice schools,  
22 that is certainly a possibility.

23          Q.     Do you know a Debbie Booker who was at  
24 Cohn Learning Center?

25          A.     She was a principal at -- when Cohn was in

1 the southeast quadrant, I served as executive  
2 director and then at principal meetings, I would  
3 know Ms. Booker.

4 Q. Do you know when -- was Cohn Learning  
5 Center closed?

6 A. You asked me, when was it closed?

7 Q. Was it closed?

8 A. When?

9 Q. Was it closed?

10 A. Oh, yes, ma'am. Yes. Yes, it was.

11 Q. Okay. Do you know whether or not Debbie  
12 Booker was moved to be a principal then?

13 A. From my understanding, I have lost track  
14 of her trajectory. I feel like she is a principal  
15 now.

16 Q. Do you know what school?

17 A. I don't, not off the top of my head.

18 Q. Did you have any discussions with Dr.  
19 Battle about the Let's Make a Slave lesson, and who  
20 complained about it?

21 A. No.

22 Q. Okay. Do you know why the director of  
23 school choice's position was eliminated?

24 A. No.

25 Q. Did you have any input into the decision

1 to eliminate jobs in the spring of 2022?

2 A. Spring of 2022?

3 Q. Spring of 2020. Thank you.

4 A. No.

5 Q. Okay. Did you have any discussions with  
6 Dr. Battle about any problems with the budget in  
7 spring of 2020?

8 A. Let's see. In the spring of 2020, I --  
9 likely to -- it was pandemic. No. No.

10 Q. Would you agree -- would you agree that if  
11 you wanted to cut money from the budget, the best  
12 person to go to talk to about that would be Chris  
13 Henson or Barry Booker?

14 A. Those are options. When you say "cut  
15 money, cut budget," are you talking about for  
16 individual performance or schools.

17 Q. Would you not agree that if you had to cut  
18 some funds from the budget, that the first  
19 individuals you should probably go to to ask about  
20 that would be Chris Henson or Barry Booker?

21 A. I think all of that whole entire team,  
22 yes.

23 Q. Now --

24 A. That could be the course of action or...

25 Q. Did you know Dr. Pippa Meriwether?

1           A.     I did. I do.

2           Q.     And what type of an associate  
3 superintendent did she make, was she competent?

4           A.     Confident seems to be subjective, and so  
5 everybody has a different definition of confidence,  
6 so if you could elaborate, please, that would be  
7 helpful, to make sure I'm hitting the target.

8           Q.     Okay. So if I use the term that's  
9 commonly used, "competent," is a person competent,  
10 you do not know what I'm asking you?

11          A.     I'm so sorry. I thought you said  
12 confident.

13          Q.     No. Competent.

14          A.     Got it. Working alongside Dr. Meriwether  
15 at times was -- you know, we had a difference of  
16 perspective in some instances, like how we might  
17 have handled something, so, I mean, you know,  
18 competent would -- I believe everyone has strengths  
19 and I believe everyone has some growth, areas for  
20 growth and...

21          Q.     Did you think Dr. Meriwether was  
22 competent?

23          A.     So the reason why I'm hesitating is  
24 because sometimes folks, you know, staff are  
25 struggling in a role, and sometimes it's -- you



1 know, so it's skill, and then sometimes it's will,  
2 right, the will to do or the want to do. I think in  
3 some instances in my interactions with Dr.  
4 Meriwether, it was -- I couldn't hardly tell if it  
5 was a skill deficit or a will deficit, right. I  
6 don't know if it was -- you know, sometimes things  
7 would take a long time to get done as a team, which  
8 should be really quick, and it took all day, you  
9 know, just an extended amount of time. And so I'm  
10 struggling with the question, like...

11 Q. Did you think Dr. Cathey was competent?

12 A. There again, I couldn't tell if it was  
13 skill or will. There are times when we've had to  
14 collaborate and we had to collaborate often, and  
15 there would be many of days where we couldn't get to  
16 an end goal for various reasons.

17 Q. Did you think Dr. Schunn Turner was  
18 competent?

19 A. Similarly. You know, I worked on a team  
20 with all of them, and, you know, I don't know if it  
21 was skill or will. It was just sometimes difficult  
22 to get anything accomplished working alongside the  
23 team.

24 Q. Did you know Dr. Turner had complained  
25 about pay disparity for females?

1 A. Can you repeat that, please.

2 Q. Did you know that Dr. Turner had  
3 complained about pay disparity for females?

4 A. Via media outlets, yes.

5 Q. Okay. And did you know about those  
6 complaints when you served as the associate  
7 superintendent alongside Schunn Turner?

8 A. I'm trying to make sure I'm getting my  
9 years right. Yes, I think at that point, you know,  
10 that had already been shared via the media.

11 Q. Did you know Dr. Cathey had complained  
12 about falsification of grades?

13 A. No.

14 Q. Did you know that Dr. Cathey had refused  
15 to say anything negative about Lily Leffler because  
16 of her associations with her relative Dr. Garcia?

17 A. Can you restate that? I'm sorry. I want  
18 to make sure I'm following.

19 Q. Did you know that Dr. Cathey refused to  
20 say anything bad about Dr. Leffler?

21 A. I don't know that he refused to, no.

22 Q. Do you know of any statements Dr. Cathey  
23 made that were negative about Dr. Leffler?

24 A. Here, again, we had conversations about  
25 all the team that we supported, so I don't have

1 specific quote, time, date that I had a conversation  
2 with Damon Cathey regarding her performance.

3 Q. Did you know that -- do you know an  
4 individual named Dr. James Bailey?

5 A. Yes.

6 Q. Did you know Dr. Bailey was supervisor of  
7 Coach Battle?

8 A. No, I did not.

9 Q. Did you know that Coach Battle was Dr.  
10 Battle's brother?

11 A. Coach Battle, I do know that Dr. Battle  
12 had a brother who coached, and so, yes, I do know  
13 that.

14 Q. Did you know it was Coach Battle at  
15 White's Creek?

16 A. No. I don't get in the dealings of who is  
17 coaching where. Given the role we're in, we don't  
18 even have what kind of -- kind of -- I mean, we have  
19 to stay focused. I didn't know.

20 Q. Did you know that Coach Battle had beat up  
21 a parent after the end of the basketball game?

22 A. I became aware that there was an incident  
23 at some point, and I didn't know any details about  
24 anybody getting beat up or any of the -- any of  
25 intricate details.

1 Q. When were you made aware of the incident?

2 A. Oh, I don't -- well after -- maybe -- you  
3 know what, it had to have been months afterwards,  
4 and I don't know any specific time, date, any of  
5 that. Again, I just try to be very much -- you  
6 know, if it's something that hits the news, I might  
7 see it, other than that, it's hit or miss.

8 Q. Dr. Springer, if you'd answer my  
9 questions, stick to my questions, we'll get through  
10 this a lot quicker.

11 A. I am so sorry.

12 MR. FOX: Objection to the form.

13 BY MS. STEINER:

14 Q. Now, who told you about Coach Battle  
15 beating up a parent? Who told you? Name a person.  
16 Who told you?

17 A. You know, I actually have to think through  
18 that. I think it was one of my colleagues.

19 Q. Who?

20 A. One of my colleagues, and I need to -- I  
21 can't recall who. You know, when we are talking --

22 Q. That's a fine answer, if you can't recall.  
23 Do you recall being told that Dr. Battle had misused  
24 funds?

25 A. No. Can recall that either.

1 Q. Did you know that James Bailey had had to  
2 nonrenew Coach Battle?

3 A. No. I don't any of the intricate details.  
4 Not to my knowledge.

5 Q. Did you hear any statements made -- if you  
6 heard Dr. Battle say, I'm not going to let anyone  
7 punk my brother, do you think that's an  
8 inappropriate statement to that?

9 A. I have never heard her say that.

10 Q. If you had heard that, would you think it  
11 was appropriate, or would it give you concern?

12 A. You know, I have never heard her speak in  
13 those terms, so I would be concerned about like --  
14 you know, yes. I would be concerned, because I've  
15 never heard her speak in those terms.

16 Q. Would you be concerned if you heard anyone  
17 in the administrative level use those words?

18 A. Yes. That's not something that we -- I  
19 mean, you know, we're all passionate about our  
20 families, but these are hypotheticals and I don't...

21 Q. What does it mean to punk someone?

22 A. Everybody has a different -- different --  
23 a different kind of way that they're thinking about  
24 that. Could be a multitude of things. Because  
25 people are thinking -- when I hear you say that,

1 what comes to mind is maybe mistreat. I'm not -- I  
2 don't utilize that word, so I don't have anything  
3 other than that.

4 Q. Okay. Do you know whether or not Dr.  
5 Battle had anything to do with Dr. Joseph leaving  
6 the school system?

7 A. No. Not to my knowledge.

8 Q. No, you do not? No?

9 A. No, I do not, not to my knowledge.

10 Q. Okay. Did you have any discussions with  
11 Dr. Battle about her brother at any point?

12 A. No.

13 Q. Okay. Did you know her brother after --  
14 did you know James Bailey's contract was nonrenewed?

15 A. No.

16 Q. Okay. Have you engaged in any protected  
17 activity, meaning filed a complaint of  
18 discrimination of Title VI, Title VII or blow the  
19 whistle on anything illegal?

20 A. No.

21 Q. Okay. Do you know of any principal that  
22 worked under you that filed a -- except for the  
23 incident that we have talked about earlier today  
24 involving Mr. Jones that occurred at JFK; do you  
25 know of any principals that were under you who had

1 engaged in any protected activity?

2 A. No.

3 Q. Okay.

4 A. No.

5 Q. Were you on any interview panels for Dr.  
6 Pippa Meriwether?

7 A. I believe that I may have been.

8 Q. Do you know what the job was for?

9 A. Seems like it was for the executive  
10 director role.

11 Q. And did you interview for all the  
12 executive directors or just for Dr. Meriwether?

13 A. I would have to go back and find those  
14 details. I can't recall. So much has happened  
15 since then.

16 Q. Do you know how you scored her?

17 A. I don't, not specifically.

18 Q. Did you interview a Mr. Chad High?

19 A. I would have to go back and confirm with  
20 you.

21 Q. Did you interview Dr. Lily Leffler?

22 A. I, again, would have to come back and  
23 confirm with you on those. I have sat in plenty of  
24 interviews, so I would have to come back and -- FYI,  
25 I do need to charge my computer, so I may have to

1 shift to my phone.

2 Q. Hang on. Just a couple of questions.  
3 What's your age?

4 A. My age?

5 Q. I hate to ask that. I just have to ask.

6 A. Yes. I am -- I had to think about it. I  
7 am 42.

8 Q. 42? And what is your date of birth?

9 A. 8/27/1979.

10 Q. Thank you. Do you know Darren Kennedy?

11 A. I do.

12 Q. Okay. Did you ever hear from anyone that  
13 James Bailey had gone up to Adrienne Battle and told  
14 her that rumors had him having an affair with Dr.  
15 Battle?

16 A. No. I know nothing about it.

17 Q. Do you recall whether or not there were  
18 any rumors that Dr. Battle was having an affair with  
19 Darren Kennedy?

20 A. No.

21 Q. Okay.

22 A. I'm serious. I have one percent left on  
23 this phone. May I transfer?

24 Q. Yes. I'm through with my questions, but  
25 you can transfer. And thank you for your patience.



1           A.     Thank you.

2           MS. HARBISON:   And I do have a few  
3 questions, Dr. Springer, but I'll let you reconnect.  
4 Do you need a minute to switch?

5           MS. STEINER:   And if I didn't already, I  
6 want to make the charts the next exhibit.

7           MR. FOX:   No objection.

8   EXAMINATION BY MS. HARBISON:

9           Q.     Dr. Springer, are you connected?

10          A.     I am.

11          Q.     Dr. Springer, my name is Jesse Harbison.  
12 I just have a couple of questions for you, okay?

13          A.     Sure.

14          Q.     Dr. Battle was promoted to interim  
15 director in the spring of 2019. I think we  
16 established that earlier, correct?

17          A.     Correct.

18          Q.     And at that time, you were named interim,  
19 either community superintendent or associate  
20 superintendent to take her place, correct?

21          A.     That is correct.

22          Q.     Did you apply for that job?

23          A.     No. As -- I was appointed to that  
24 position.

25          Q.     Who appointed you or who made the decision

1 to appoint you; do you know?

2 A. Well, human resources, we were in  
3 communication. So I assume Dr. Battle, being the  
4 director of schools, certainly came from Dr. Battle.

5 Q. Do you know why you were chosen to be  
6 appointed as opposed to anyone else?

7 A. I never asked.

8 Q. You did not?

9 A. I did not.

10 Q. How long have you known Dr. Battle?

11 A. During our time as principal, I was here  
12 in principal meetings, and then we began to work  
13 closer together as executive director, and then, you  
14 know, just continued to be colleagues.

15 Q. Okay. So you have no idea why you were  
16 chosen for that job instead of anyone else; is that  
17 what you're saying?

18 A. Well, that -- what I thought you were  
19 asking was, do I know why anyone else wasn't  
20 selected, I don't know that.

21 Q. Do you know why you were selected?

22 A. I can imagine that the individual in that  
23 role needs someone who is aligned to the district  
24 vision, who implements, who, you know, can serve as  
25 a leader in the district and that would embody

1 similar core leadership values.

2 Q. Are you aligned to the district vision?

3 A. I believe that I am. I believe that I am  
4 in line with re-envisioning the support hub, central  
5 office and the support school where we support  
6 schools, and that's what we're here to do, and we  
7 empower to put leaders at all levels and then we  
8 help create the conditions for optimal learning and  
9 that we embody -- I embody the desire to identify  
10 and eliminate inequities, absolutely.

11 Q. What core values are you referring to when  
12 you refer to core values?

13 A. I'm referring to those values as a leader  
14 in our organization and specifically our core values  
15 we've identified as a district. (Court reporter  
16 asks for clarification.)

17 MR. FOX: Maybe, Dr. Springer, I think if  
18 you'd slow down and speak a little louder, that  
19 would help.

20 BY MS. HARBISON:

21 Q. So you had these core values more so than  
22 any other individual that might have been appointed,  
23 is that what you're saying?

24 A. I think that -- no, that's not what I'm  
25 saying. I hope there are others in the organization

1 that also embody these similar tenets and values as  
2 a leader.

3 Q. Okay. How many years have you known Dr.  
4 Battle?

5 A. I became principal -- I'd say at least  
6 20 -- over about ten years.

7 Q. Okay.

8 A. Over ten years.

9 Q. Okay. Would you say that you got along  
10 with Dr. Battle better than the other associate  
11 superintendents when you served as an associate  
12 superintendent?

13 A. Now, I did not serve alongside Dr. Battle  
14 as an associate superintendent.

15 Q. That's not what I'm asking. I'm asking --

16 A. Sorry.

17 Q. -- when you were an associate  
18 superintendent, did you get along better with Dr.  
19 Battle than the other associate superintendents, in  
20 your opinion?

21 A. No, I think I stated this earlier, I can  
22 get along with anyone, so I don't -- you know, there  
23 wasn't an issue where we didn't get along. I get  
24 along with Dr. Battle, I get along with any of the  
25 associate superintendents.

1 Q. Okay. You interviewed for the executive  
2 director job, didn't you?

3 A. I did. I interviewed for that role.

4 Q. But did you also testify earlier that you  
5 were on the panel for it?

6 A. No.

7 Q. I thought you said that you did  
8 interview -- you did participate in the interview  
9 for Dr. Pippa Meriwether for the executive director  
10 job, did I mishear you?

11 A. You did, and at that point, I had  
12 already -- you know, at that time, I had already --  
13 maybe I'm not understanding your question. I  
14 interviewed for executive director in 2016, sat on  
15 panels, 2020, for executive director. Is that what  
16 you're saying?

17 Q. Okay. So you sat in on the interview  
18 panel for the executive director in 2020, for the  
19 executive director job in 2020, correct?

20 A. Correct.

21 Q. You did not interview for the executive  
22 director job in 2020. Is that what you're saying?

23 A. No, I interviewed at some point for  
24 executive director role, yes, I did.

25 Q. Okay. Hold on one second. I just want to

1 make sure I'm very clear, because I'm getting  
2 confused. Did you testify earlier that you sat on  
3 the interview panel for Dr. Meriwether's interview  
4 for executive director?

5 A. I did.

6 Q. Okay. I'm going to show you a document.  
7 Give me one sec.

8 A. Sure.

9 Q. Are you able to see documents on your  
10 computer?

11 A. I can.

12 Q. On your phone?

13 A. Yes.

14 Q. Okay. Dr. Springer, can you --

15 A. Ma'am, can you hold just one second so I  
16 can let colleagues know I'm going to be delayed  
17 here.

18 Q. Sure.

19 A. Thanks.

20 (Brief break observed.)

21 BY MR. FOX:

22 Q. Okay. Dr. Springer, are you there?

23 A. Yes, I am.

24 Q. Do you recall scoring Dr. Meriwether for  
25 that interview?

1           A.     It's part of the process, yes, I'm sure I  
2 did.

3           Q.     Okay. I'm going to share my screen with  
4 you again.

5           A.     All right.

6           Q.     Before I do that, let me ask one more  
7 question. Do you recall anything specific about how  
8 you scored her for that interview?

9           A.     Not anything specific at this time, I  
10 don't. Can you hear me good?

11          Q.     Dr. Springer, can you see my screen?

12          A.     I can.

13          Q.     Okay. This was a set of documents that  
14 was produced in response to a public records request  
15 made by one of the plaintiffs in this case, okay?

16          A.     Okay.

17          Q.     And it is -- I'll scroll up so you can see  
18 it. It's a set of Microsoft Teams meeting invites  
19 that are each titled executive director-schools  
20 interview, most of which are in the latter half of  
21 May 2020. So, for example, you can see here on the  
22 screen, the subject is executive director-schools  
23 interview. The date is May 21. The required  
24 attendees include a list of individuals, and the  
25 last individual is James Witty; do you see that?

1 A. Yes.

2 Q. Is James Witty an executive director  
3 currently?

4 A. He is an executive director.

5 Q. Okay. So you see in this list of meeting  
6 invitations, the names of the required attendees  
7 typically stay the same, Chris Barnes, Ken Stark,  
8 David Williams, Sharon Griffin, Elisa Norris, and  
9 then the last name changes, and that is the name of  
10 the individual who was interviewing for the job.  
11 Does that make sense to you?

12 A. Yes.

13 Q. Okay. I'm going to show you this page,  
14 which is marked plaintiffs 322 at the bottom. This  
15 is a Teams invitation for executive director-schools  
16 interview for May 22, 2020, and you're the last  
17 invitee or required attended on this invitation; do  
18 you see that?

19 A. Yes.

20 Q. So you interviewed for the executive  
21 director job in May of 2020, correct?

22 A. Yes. That's what I was trying to say  
23 earlier.

24 Q. Okay. You testified earlier that you  
25 interviewed for the chief of student support



1 services job on May 20, 2020, correct?

2 A. From my recollection, yes.

3 Q. So two days prior to this job, or to this  
4 interview for executive director, correct?

5 A. I believe so.

6 Q. Do you recall when you learned that you  
7 got the chief of student support services job?

8 A. Yeah. It had to -- I don't recall the  
9 exact date, but it couldn't have been too much after  
10 that. I don't recall the exact date.

11 Q. Okay. But it would not have been before  
12 May 22, 2020, because that was the day you  
13 interviewed for the executive director job, correct?

14 A. That sounds right.

15 Q. Okay. I'm going to make this page or this  
16 group of pages with the interview invitations, so  
17 plaintiff's 318 through -- hold, please, 332, the  
18 next-numbered exhibit.

19 (WHEREUPON, the  
20 previously-mentioned document was  
21 marked as Exhibit Number 6.)

22 MS. HARBISON: And I don't have any  
23 further questions.

24 FURTHER THIS DEPONENT SAITH NOT

25

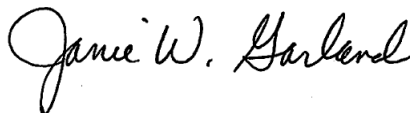
## REPORTER'S CERTIFICATION

STATE OF TENNESSEE       )  
COUNTY OF DAVIDSON       )

I, Janie W. Garland, LCR#111, licensed court reporter, in and for the State of Tennessee do hereby certify that the above deposition was reported by me via remote means and that the foregoing pages of the transcript is a true and accurate record to the best of my knowledge, skills, and ability.

I further certify that I am not related to nor an employee of counsel or any of the parties to the action, nor am I in any way financially interested in the outcome of this case.

I further certify that I am duly licensed by the Tennessee Board of Court Reporting as a Licensed Court Reporter as evidenced by the LCR number following my name below.



Janie W. Garland, LCR#111

I, Michelle Maultsby Springer, having read the foregoing deposition, Pages 1 through 121, do hereby certify said testimony is a true and accurate transcript, with the following changes (if any):

[illegible]

\_\_\_\_\_

Michelle Maultsby Springer

	24 [3] 1/24 3/2 61/15	actions [2] 36/12 58/18
BY MR. FOX: [1] 118/21	3	activity [2] 110/17 111/1
BY MS. HARBISON: [1] 115/20	3.3 [1] 86/2	actually [10] 19/9 33/7 33/10 39/7
BY MS. STEINER: [20] 6/14 15/2 15/9	3.6 [1] 86/2	39/12 44/18 44/20 80/7 82/12 108/17
21/23 24/22 27/12 28/3 31/18 38/9	31 [1] 4/6	add [1] 8/10
52/13 58/9 60/5 60/10 62/12 64/11	318 [1] 121/17	added [6] 67/16 68/8 68/20 68/23 69/2
65/9 85/11 88/22 99/5 108/13	322 [1] 120/14	69/7
MR. FOX: [19] 6/10 14/23 21/20 24/16	33 [1] 33/4	addition [2] 79/15 79/15
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